Phase I Environmental Site Assessment – Portac, Inc. Beaver Mill and Forks Mill, Clallam County, Washington

Prepared for



2211 Rimland Dr., Suite 220 Bellingham, WA 98226

Prepared by

Parametrix

700 NE Multnomah, Suite 1000 Portland, OR 97232-4110 503-233-2400 www.parametrix.com



CITATION

Parametrix. 2008.

Phase I Environmental Site Assessment – Portac, Inc.

Beaver Mill and Forks Mill, Clallam County, Washington.

Prepared by Parametrix, Portland, Oregon.

August 1, 2008.

CERTIFICATION

The technical material and data contained in this document were prepared under the supervision and direction of the undersigned, whose seal, as a professional engineer licensed to practice as such, is affixed below. We declare that, to the best of our professional knowledge and belief, we meet the definition of Environmental Professional as defined in §312.10 of 40 CFR 312. We have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. We have developed and performed the all appropriate inquires in conformance with the standards and practices set forth in 40 CFR Part 312.



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EXECUTIVE SUMMARY

Parametrix was retained by the Interfor Pacific to perform a Phase I Environmental Site Assessment (ESA) on the Portac, Inc. Beaver Mill and Forks Mill (subject properties) in Clallam County, Washington.

Parametrix conducted a Phase I ESA in conformance with the scope and limitations of ASTM Standard Practice E 1527-05. Any exceptions to, or deletions from, the Standard Practice are described in Section 1.2 of this report. Based on the findings of this investigation, Parametrix reached the following conclusions:

- The subject properties are located in Clallam County Washington and include the Beaver Mill and Forks Mill sites. The Beaver Mill is a 44-acre site located at mile post 201 on Highway 101 near Beaver Washington. The Forks Mill site is a 21.5-acre site located a 143 Sitcum Sol Duc Road in Forks Washington.
- The Beaver Mill site is an operating saw mill that produces lumber which is trucked to the Forks Mill. The Forks Mill site is an operating planner mill and kiln which takes sawn lumber from the Beaver Mills site. The lumber is then trimmed to length, planed, graded, and packaged for shipment to customers.
- 3. Based on historic information, the Beaver Mill site began operations at the site between 1947 and 1957. The site had been a veneer mil and a chip mill prior to the saw mill operation. The Forks Mill site has been operating at that site since 1995 when the planing mill and kilns were constructed.
- 4. A review of regulatory information indicates that the Beaver Mill and Forks Mill sites are listed in the regulatory databases. The Beaver Mill site is listed as an Orphan site in the CSCSL-NFA database. The site reportedly received a No Further Action Determination from the State after initial assessment of the site. The Forks Mill site is listed in the SPILLS database. The site reportedly had a spill of 350-gallons of diesel fuel which was released to a paved roadway in September 2001. The spill at the Forks Mill site represents a recognized environmental condition. The spill was contained on the pavement and no impacts occurred.
- Several adjacent or nearby sites were identified in the regulatory record databases.
 However, based on the level of cleanup at these sites or the distance of these sites to
 the subject property, these sites do not appear to represent recognized environmental
 conditions to the subject property.
- 6. Environmental audits by WES were reviewed to gain an understanding of past potential environmental concerns. The audits indicate that minor spills, leaks, and site conditions representing environmental concern were observed. Based on these observations, petroleum product impacts to subsurface soil at the Beaver and Forks mills may have possibly occurred. The audits noted that rain water from the collection sump at the Beaver Mill site was passed though an oil/water separator and discharged to the pavement which eventually leads to the stormwater collection system. This process could be a transport mechanism for petroleum impacted water to reach the stormwater system and potentially subsurface soil at the site from repeated releases. Other observations indicated that the spill containment pad constructed at the 3,000-gallon diesel fuel AST at the Forks Mill site was undersized and required frequent maintenance to clear debris from the spill collection area. However, this area is paved and presents a small likelihood of petroleum product impacts to the subsurface. It was also noted that process water at the Forks Mill site was observed to be overflowing from the condensate tanks and could eventually

reach the unlined stormwater ditch. It was also noted the 11,000-gallon oil AST near the boiler at the Forks Mill site does not contain overhead cover or spill containment. In addition, boiler water treatment chemical drums were observed at the Forks Mill site without secondary containment. The audits also indicate Portac made efforts to correct most of the recognized environmental conditions noted in the reports.

- 7. During the site walk, both the Beaver Mill and Forks Mill showed signs that oil spills or leaks had come in contact with soil and pavement. Several oil stains on pavement were observed surrounding the maintenance shop of the Beaver Mill site. Oil stained soil was observed at the southwest corner of the mill building, at the north side of the mill building at a stormwater collection basin and beneath old equipment north of the mill building. Significant oil stained concrete was observed in the lubricant shed and minor oil stains on asphalt pavement just outside the shed.
- Oil stained pavement was observed at the 3,000-gallon diesel fuel AST and north of the maintenance shop at the Forks Mill site. Oil stained soil was observed northwest of the maintenance shop and beneath a front loader northeast of the kiln cooling shed.
- 9. The interview with the key site manager at the Beaver Mille site indicated that recognized environmental conditions may be present from past operations. Warren Blakeslee stated that the previous mill owner had stored oil drums above soil near the northeast corner of the mill and spills and leaks had occurred. The oil leaks to the soil in this area represent a recognized environmental condition. The interview with the key site manager at the Forks Mill site had no knowledge of site conditions not observed during the site visit that would represent recognized environmental conditions.
- Data gaps exist due to the incomplete examination of all site features, specifically interior portions of the mill buildings.

Based upon the conclusions of this investigation of the subject property, Parametrix offers the following recommendations.

- Areas of identified oil stains and potential environmental impact should be inspected and cleaned up, as appropriate. All stained soil should be excavated and disposed in accordance with local and state regulations.
- General housekeeping practices, including equipment maintenance, equipment storage, facility washdown, and chemical or petroleum use, storage, and transfer, should be reviewed and modified to prevent potential environmental impacts.
- All oil storage areas should be reviewed for compliance with Spill Prevention, Control and Countermeasure (SPCC) regulations. Deficiencies with petroleum storage, including overhead cover or secondary containment, should be corrected. An SPCC Plan should be prepared or updated, as needed.
- 4. Operations at the sites, specifically stormwater runoff and process water discharge, should be reviewed and modified to prevent possible impacts to the subsurface. All areas of oil residue in contact with stormwater discharge (i.e., stormwater infiltration basin at the Beaver Mill site and exterior pipe at the Forks Mill building) should be modified such that oil residue does not enter the stormwater system or subsurface.

1. INTRODUCTION

Parametrix was retained by Interfor Pacific to conduct a Phase I Environmental Site Assessment (ESA) on the Portac, Inc. Beaver Mill and Forks Mill properties (subject properties). The Beaver Mill site is currently owned by Portac, Inc. and is planned for ownership transfer. The Forks Mill site is currently owned by the City of Forks and is leased by Portac, Inc.

1.1 PURPOSE

The Phase I ESA was conducted in accordance with ASTM Standard E 1527-05 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, which defines the generally accepted industry practices and procedures currently applicable at the time and place of this study. The Phase I ESA is intended to permit the user to satisfy the requirements to qualify for the bona fide prospective purchaser limitation under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) liability and as such constitutes "all appropriate inquires in the previous ownership and uses of the property consistent with good commercial or customary practice" as defined by 42 United States Code (USC) §9601 (35)(B).

The purpose of the Phase I ESA is to identify "Recognized Environmental Conditions" defined by ASTM Standard E 1527-05 as:

"...the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to include de minimus conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies."

The Phase I ESA is intended for the purpose of providing sufficient information regarding the nature and extent of potential environmental impacts, if present, to provide the level of knowledge necessary to satisfy the innocent purchaser defense under CERCLA.

1.2 SIGNIFICANT ASSUMPTIONS

This assessment was conducted in accordance with generally accepted industry practices and procedures within the scope of work authorized at the time and place of this study. Parametrix's observations are limited to those areas to which it had access on the subject property.

Methodology included viewing accessible areas of the exteriors subject properties on foot. The interior of the subject property buildings were not inspected. No other exceptions to the guidelines presented in ASTM E1527-05 were made during completion of this Phase I ESA.

1.3 LIMITATIONS

The findings, conclusions, and recommendations presented in this report are based on site conditions and the best available information known or made available by regulators, other consultants, or other sources at the time of the investigation. Parametrix conducted a diligent

search and investigation in compliance with prevailing standards of the profession; however, certain adverse conditions may exist at the sites that were not detected at the time of the investigation. Parametrix did not observe building interiors of the Beaver Mill or Forks Mill sites. Site conditions may exist inside the buildings of both sites that were not observed that at the time of the site visit that may be cause for environmental concern.

The services provided under this contract as described in this report include professional opinions and judgments based on data collected. These services have been provided according to generally accepted engineering practices. The opinions and conclusions contained in this report are typically based on information obtained from:

- · Observations and measurements made by Parametrix field staff.
- · Contacts and discussions with regulatory agencies and others.
- · Review of available hazardous substance or solid waste lists.
- Opinions and judgments of Parametrix based on the information available.

In the professional judgment of Parametrix, the services performed pursuant to the scope of services are an adequate basis to collect data for a preliminary evaluation of the site and upon which to draw the conclusions stated in this report.

2. SUBJECT PROPERTIES DESCRIPTION

2.1 LOCATION

The subject properties are located in Clallam County, Washington. The Beaver Mill site is located north of Highway 101 at mile post 201 in Beaver, Washington. The Forks Mill site is located at 143 Sitcum Sol Duc Road in Forks, Washington. The locations, site vicinity maps, and boundaries of the Beaver Mill and Forks Mill sites are shown on Figures 1 through 5.

2.2 SITE AND VICINITY CHARACTERISTICS

2.2.1 Beaver Mill

The Beaver Mill site is an approximately 44-acre site located at 200673 Highway 101, west of Beaver, Washington (Figure 2). The site is located north of Highway 101 and south of Lake Pleasant. Residential properties border the site on the west and east. A small lagoon is located southwest of the site. The surrounding properties are primarily timberland.

Site structures include a saw mill and sorter, office building, a maintenance shop, lubricant storage shed, refueling shed, scale, and lumber storage yard. The log yard is unpaved and encompasses approximately 35 acres of the site. Approximately 9 acres of the site is paved and provides parking, passage for logging trucks and other vehicles, and storage of logs and finished timber products.

Operations at this site consists of: purchasing and storing logs, removing the bark from log stems, bucking the stems into shorter blocks, and sawing the short log blocks into lumber. The mill also produces hogged bark, sawdust, and chips. Sawn lumber from Beaver Mill is trucked to the Forks Mill where it is kiln-dried by steam boilers. The lumber is then trimmed to length, planed, graded, and packaged for shipment to customers.

2.2.2 Forks Mill

The Forks Mill site is an approximately 21.5-acre site located at 143 Sitcum Sol Duc Road, north of the city of Forks, Washington (Figure 3). The site is located east of Highway 101 in the Forks Industrial Park.

Site structures include a planning mill, office, dry kilns, cooling sheds, boiler building, saw dust storage, maintenance shop, scales, and lumber storage. Much of the site is paved and provides parking, passage for logging trucks and other vehicles, and storage of finished lumber products.

Sawn lumber from the Beaver Mill site is brought to the Forks Mill where it is kiln dried, planed and cut to finished lumber. The finished lumber is then bundled and stacked until it is loaded on trucks for shipment.

2.3 PHYSICAL SETTING

Both the Beaver Mill and Forks Mill sites are located on the foothills of the Olympic Peninsula Mountain complex. The Olympic Peninsula is bordered to the north by Vancouver Island, British Columbia, and the Strait of Juan de Fuca. To the west is the Pacific Ocean and to the east are the Puget Sound and the Cascade Mountains.

The Olympic Peninsula consists of Upper Eocene and Oligocene sedimentary rocks (23 to 40 million years old) that make up the core of the mountain range. These rocks form the western, eastern, and central core of the peninsula (Tabor and Cady 1978). Older, early-middle Eocene (43.6 to 57.8 million years old) marine basaltic rocks form a horseshoe shape encircling the foundation rocks, with the open end of the horseshoe facing the Pacific Ocean to the west. The Ice Age of the Pleistocene Epoch and low global temperatures created the Cordilleran ice sheet which covered the northwestern section of North America. Thick sequences of glacial material were deposited during this period. The deposits apron the older rocks and generally thin out against the mountains.

Based on soil boring logs and geologic maps reviewed for the vicinity of the subject properties, shallow soil in the area is glacial outwash and glacial till consisting of unconsolidated cobbles in a loose gravelly sand or silt matrix (Schasse 2003). Groundwater at the Beaver Mill site is expected to range seasonally between 20 to 30 feet below ground surface (bgs), and shallow groundwater flow is to the north towards Lake Pleasant. Most groundwater wells in the vicinity of the Beaver Mill are screened at depths ranging from 130 to 150 feet bgs. Groundwater at the Forks Mill site is expected to range seasonally between 15 to 25 feet bgs, and shallow groundwater flow is to the northwest towards the Soleduc River.

2.4 CURRENT USE OF THE PROPERTY

The Beaver Mill site is currently an operating saw mill and log yard. The Forks Mill site is currently a planner mill and kiln. Zoning for the Beaver Mill site has been designated as Western Region Rural Center (WRC). Zoning for the Forks Mill site has been designated as City (CTY).

2.5 DESCRIPTIONS OF IMPROVEMENTS ON THE SUBJECT PROPERTY

The Beaver Mill contains three major buildings: the main saw mill building, chipper building, and the maintenance shop. Approximately 9 acres of the site is paved. The Beaver Mill site obtains potable water from an on-site well. Sewer for the site is discharge to a septic system. Electricity is supplied to the site by the local government utility.

The Forks Mill site contains three major buildings: the planner mill building with attached offices, the kiln building with boiler shed and cooling shed, and the hog fuel storage shed. Most of the site is paved with the exception of a small area at the north end of the site and the stormwater retention pond located at the south end of the site. The Forks Mill site receives potable water from the City of Forks. Electricity is supplied to the site by the local government utility.

2.6 ENVIRONMENTAL LIENS

An environmental lien is defined by ASTM as a charge, security, or encumbrance upon title to a property to secure the payment of a cost, damage, obligation, or duty arising out of response actions, cleanup, or other remediation of hazardous substances or petroleum products. Based on information from Portac, Inc., no environmental liens against the Beaver Mill or Forks Mill properties were identified during the course of the Phase I ESA.

3. RECORDS REVIEW

The purpose of the records review task was to gather environmental data on the subject property prior to the site examination. The information review consisted of two subtasks: a review of various lists and files published by federal and State of Washington agencies; and a compilation of historic uses of the site and site vicinity to determine if past operations pose an environmental risk to the subject property. Information for agency file review is based, in part, on a report provided by Environmental Data Resources, Inc. (EDR). The EDR report is included in Appendix A. Database search results for the Beaver Mill and Forks Mill sites are shown on Figures 2 and 4, respectively.

The EDR report is a summary of state and federal database searches for sites of possible environmental concern. The information review enabled Parametrix personnel to characterize the types of activities performed at the site, identify data gaps prior to the site examination, and facilitate recognition of discrepancies between reported and observed data. Data gaps identified during the document review were addressed by interviewing knowledgeable personnel, observations during the site examination, or by additional detailed investigation.

It should be noted that this information is reported as Parametrix received it from EDR, which in turn reports information as it is provided in various government databases. It is not possible for either Parametrix or EDR to verify the accuracy or completeness of information contained in these databases. However, the use of and reliance on this information is a generally accepted practice in the conduct of environmental due diligence. The following sections present information from the document review:

3.1 STANDARD ENVIRONMENTAL RECORD SOURCES

3.1.1 Washington Department of Ecology Databases

The following sections summarize the most relevant information obtained from the EDR report regarding sites identified within the ASTM 1527-05 search radii from the following Washington Department of Ecology (Ecology) databases. A complete listing of the Ecology databases reviewed is included in the EDR report.

- Ecology Underground Storage Tank (UST) List
- Ecology Leaking Underground Storage Tank (LUST) List
- Ecology Confirmed and Suspected Contaminated Sites List (CSCSL)
- Ecology Solid Waste Facility (SWF/LF) List
- Ecology Spills List
- Ecology Brownfields List
- Ecology Drycleaners List

3.1.1.1 Ecology UST List

The UST List database contains registered USTs. USTs are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA). The data was obtained from the Ecology's UST List.

Information contained in the EDR report indicates that the Beaver Mill and Forks Mill sites are not listed in the UST database. No UST sites were identified within 0.50 mile of the subject properties.

3.1.1.2 Ecology LUST List

The LUST Incident Reports contain an inventory of reported leaking underground storage tank incidents. The data come from the Ecology's LUST Database List.

Information contained in the EDR report indicates that the Beaver Mill and Forks Mill sites are not listed in the LUST database. No LUST sites were identified within 0.50 mile of the subject properties.

3.1.1.3 Ecology CSCSL

The CSCSL identifies and tracks the State's hazardous waste sites. State Hazardous Waste Site (SHWS) records are the State equivalent of CERCLIS. These sites may or may not already be listed on the federal CERCLIS list. Priority sites planned for cleanup using state funds (state equivalent of Superfund) are identified along with sites where cleanup will be paid for by potentially responsible parties.

Information contained in the EDR report indicates that the Beaver Mill and Forks Mill sites are not listed in the CSCSL/SHWS databases.

One CSCSL site is identified within 0.50 mile of the Forks Mill site. The Pettit Oil Co. Forks Bulk Plant site (392 La Push Road) is a listed SHWS and is located approximately 0.50 mile from the Forks Mill site. Non-halogenated solvents and petroleum have been confirmed in soil and are suspected to be present in groundwater. The site is awaiting final cleanup actions. This site does not appear to represent a recognized environmental condition to the Forks Mill site.

3.1.1.4 Ecology Solid Waste Facility (SWF/LF) List

The SWF/LF records an inventory of solid waste disposal facilities or landfills. These may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites.

Information contained in the EDR report indicates that the Beaver Mill and Forks Mill sites are not listed in the SWF/LF database.

One SWF/LF site is identified within 0.50 mile of the Forks Mill site. The West Waste Transfer Facility site (272 La Push Road) is located a little more than 0.50 mile southwest of the Forks Mill site. This site does not appear to represent a recognized environmental condition to the Forks Mill site.

3.1.1.5 Ecology Spills List

The Ecology Spills list is reported spills to the Spill Prevention, Preparedness, and Response Division.

Information contained in the EDR report indicates that the Forks Mill site is listed in the Spills database. The site reportedly had a spill of 350-gallons of diesel fuel in September 2001. Supplemental information obtained from the Ecology records department indicate a pump failed during a power outage and released the fuel to the paved area. The spill was contained to the pavement and no impact to soil or groundwater occurred and no waterways or storm drains were breeched.

3.1.1.6 Ecology Brownfields List

The Brownfields database lists sites of real property where expansion or redevelopment is complicated by actual or perceived environmental contamination. Brownfield sites are not reported within 0.50 mile of the subject properties.

3.1.1.7 ECOLOGY Drycleaner List

The drycleaner database is a listing of former or current drycleaners in Washington. Drycleaner sites are not identified within 0.25 mile of the subject properties.

3.1.2 EPA Databases

EPA administers several programs designed to protect the environment and monitor the generation, storage, treatment, and disposal of hazardous substances. The following sections summarize the most relevant information obtained from the EDR report regarding sites identified within ASTM 1527-05 search radii from the following databases. A complete listing of the EPA databases reviewed is included in the EDR report.

- EPA Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) List
- EPA National Priorities List (NPL)
- EPA Resource Conservation and Recovery Act (RCRA) Corrective Action Report (CORRACTS) List
- EPA Resource Conservation and Recovery Information System (RCRIS) List
- EPA Emergency Response Notification System (ERNS) List
- · EPA U.S. Brownfields List

3.1.2.1 EPA CERCLIS List

EPA publishes a list of sites that may potentially pose a threat to the environment or the health of the general public. CERCLIS contains data on potentially hazardous waste sites that have been reported to the EPA by states, municipalities, private companies, and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

Information contained in the EDR report indicates the Beaver Mill and Forks Mill sites are not listed in the CERCLIS database. No CERCLIS sites were identified within 1 mile of the subject properties.

The EPA publishes the CERCLIS-NFRAP list, which are CERCLIS sites that have been designated "no further remedial action planned" and have been removed from the CERCLIS list. Information contained in the EDR report indicated that the subject properties are not listed as a CERCLIS-NFRAP site. CERCLIS-NFRAP sites are not identified within 0.50 mile of the subject properties.

3.1.2.2 EPA NPL List

The NPL identifies priority hazardous waste sites for remedial actions under the EPA Superfund program. The EDR report indicates that the subject properties are not listed in NPL database. No NPL sites were identified within 1 mile of the subject properties.

3.1.2.3 EPA CORRACTS List

The CORRACTS List identifies hazardous waste handlers with corrective action activity. Information contained in the EDR report indicates the subject properties are not listed as a CORRACTS site. No CORRACTS sites are listed within 1 mile of the subject properties.

3.1.2.4 EPA RCRIS List

The RCRIS List includes selective information on sites which generate, transport, store, treat, and/or dispose of hazardous waste as defined by the RCRA. Information contained in the EDR report indicates the Forks Mill site is listed as a RCRIS site. The Forks Mill site is listed historically as a Large Quantity Hazardous Waste Generator (LQG) with no violations. The database indicates the site has not generated hazardous materials since 1998 and is currently not generating hazardous materials.

3.1.2.5 EPA ERNS List

The ERNS List is a national database containing information from spill reports made to federal authorities. Information contained in the EDR report indicates the subject properties are not listed in the ERNS database. No ERNS sites are listed near the subject properties.

3.1.2.6 EPA U.S. Brownfields List

The U.S. Brownfields list identifies brownfields properties addressed by Cooperative Agreement Recipients and brownfields properties addressed by Targeted Brownfields Assessments. The EDR report indicates the subject properties are not listed in the U.S. Brownfields database. No U.S. Brownfields are listed within 0.50 mile of the subject properties.

3.1.2.7 EPA Orphan Site List

Orphan sites are sites for which mapping information is not detailed adequately to plot the location of the site, for which there is no known responsible party, or the responsible party is unwilling or unable to pay for cleanup. The Orphan site list and available mapping information were reviewed by Parametrix. The Beaver Mill site is identified by EDR as an "orphan" site. The site is listed in the CSCSL NFA database. The site received a No Further Action determination after assessment in September 2003. The Forks Mill site is also identified by EDR as an "orphan" site. The site is listed in the AIRS (Washington Emissions Data System) database. The data is of emissions inventory. No other information is provided in the database listing.

3.2 HISTORICAL USE INFORMATION

The objective of the historical use information review is to develop a history of the previous uses of the subject properties and surrounding area. This helps to identify the likelihood of any past uses having led to recognized environmental conditions. Parametrix researched the historic land use, occupancy, and ownership of the subject properties and adjacent properties to evaluate historic uses that are known to be associated with recognized environmental conditions. Historic records reviewed include Sanborn Fire Insurance MapsTM, historical topographic maps, and historical aerial photographs.

3.2.1 Sanborn Maps Fire Insurance Maps

The availability of Sanborn Fire Insurance Maps for the subject properties was researched in order to establish historic business operations at the subject properties and adjacent properties. Sanborn maps for the subject properties were not produced and are not available for the subject properties. The Sanborn Fire Insurance Map research report is included in Appendix B.

3.2.2 Historical Topographic Maps

Historical topographic maps of the Beaver Mill and Forks Mill sites were obtained from EDR. Historical topographic maps for the years 1947, 1957, 1984, and 1999 were examined. Copies of the topographic maps are included in Appendix C. Observations are listed below.

Beaver Mill

- Buildings or other structures are not shown on the Beaver Mill site. A railroad line can be observed north of Highway 101 on the Beaver Mill site. The lagoon located west of the site is evident and west of the lagoon a structure can be observed.
- A rectangular structure is evident on the Beaver Mill site. A gravel pit is depicted just south of the structure. Small residential structures can be observed west of the lagoon.
- 1984 The Beaver Mill site appears to have added a small structure northwest of the building identified on the previous map. Residential structures appear to have been constructed east of the site.
- 1999 No significant changes from the previous map are evident.

Forks Mill

- 1947 No buildings or other structures are shown on the Forks Mill site. Highway 101 is evident west of the Forks Mill site.
- 1957 No significant changes from the previous map are evident.
- 1981 A gravel pit is depicted north of the Forks Mill site. No other significant changes from the previous map are evident.

3.2.3 Historical Aerial Photographs

Historical aerial photographs of the Beaver Mill and Forks Mill sites were obtained from EDR. Aerial photographs for the years 1981, 1990, and 2006 were examined. Copies of the aerial photographs are included in Appendix D. Observations are listed below.

Beaver Mill

The site shown on the photograph occupies approximately half of the area of the current mill. The old mill building and log yard occupy the site west of the main entrance road. Operations at the site appear to occupy the site west of the entrance road from Highway 101 up to the edge of Lake Pleasant. No other significant site features can be distinguished due to the poor quality of the photograph.

- 1990 The site appears to have expanded log storage areas to the east side of the main entrance road to the site from Highway 101. The log deck and sorting areas appears to occupy much of the site. Stormwater ponds do not appear to be present. No other significant site features can be distinguished due to the poor quality of the photograph.
- 2006 Features at the site appear to be in the current configuration of the property. The saw mill building, chip mill, baghouse hopper, and maintenance shop can be observed in the northwest corner of the site. The log yard and stormwater treatment ponds are apparent.

Forks Mill

- 1981 The photograph shows the site as undeveloped but cleared of trees. The site is located in the Forks Industrial Park. The area surrounding the site is heavily wooded. Some commercial or industrial development is evident southwest of the site and west of Highway 101.
- 1990 It appears that a small structure or possibly a semi trailer is located in the southwest corner of the Forks Industrial Park, southwest of the mill site. No other significant changes are evident compared to the previous aerial photograph. No other significant site features can be distinguished due to the poor quality of the photograph.
- 2006 The Fork Mill has been constructed. The mill building, kiln building, saw dust storage shed, maintenance shop, and cut timber storage areas are apparent. Other areas of the industrial park have also been developed. Properties east, north, and west of the site have been cleared of vegetation and buildings have been constructed.

4. WHITMAN ENVIRONMENTAL AUDITS

Environmental audits of the Beaver Mill and Forks Mill site for Portac, Inc. were conducted by Whitman Environmental Sciences (WES) of Seattle Washington. The audits were completed by Daniel Whitman.

4.1 BEAVER MILL SITE

WES has conducted site environmental audits at the Beaver Mill site since 1997. Parametrix reviewed five audit reports from May 2001 to October 2003. Summaries of the observation made during the audit site walks at the Beaver Mill site are provided below.

- The May 29, 2001 environmental audit indicated that the inside of the plant, maintenance building, and log yard appeared in good condition. Chemical or petroleum stains where not observed at the site, the shop appeared relatively well organized, and drums and empty chemical containers were kept to a minimum. The audit describes the condition of the stormwater collection ponds. The main stormwater pond located northeast of the mill building was noted to contain a small amount of oil sheen at the time of the inspection. A 12,000-gallon aboveground fuel tank was noted during the inspection lacks a permanent spill pan beneath the dispensing area. The audit recommended that a permanent spill containment pad, collection sump, and cover over the dispensing area be constructed.
- The November 26, 2001 environmental audit noted similar housekeeping conditions
 of the site as noted during the previous environmental audit. A small amount of oil
 sheen was again noted in the main stormwater pond. The audit again recommended a
 permanent spill containment pad, collection sump, and cover over the dispensing area
 be constructed.
- The October 11, 2002 environmental audit noted similar housekeeping conditions of the site as noted during the previous environmental audit. A new maintenance shop has been constructed and appeared in good condition and well organized. However, repair activities were still occurring in the old maintenance shop connected to the main mill building. The audit states that new log handling equipment was installed near a catch basin that reportedly drains to a stormwater retention pond located south of the mill building. The catch basin was noted to be a persistent maintenance problem, due to wood waste and leaks and/or spills of hydraulic fluid. However, it should be noted that this was not indicated in previous environmental audits. A covered spill containment area with concrete berm and collection sump was observed to have been constructed at the 12,000-gallon aboveground storage tank (AST).
- The March 12, 2003 environmental audit repeated much of the same information as noted in the previous environmental audits. One change observed was an excess of rainwater being introduced to the collection sump at the location of the AST. Portac constructed a small multi-chambered oil/water separator that passes rainwater from the sump through the separator before being discharged to the pavement which drains to the main stormwater pond.
- The October 10, 2003 environmental audit repeated much of the same information as noted in the previous environmental audits. No new additional relevant information regarding hazardous materials or petroleum products was noted.

4.2 FORKS MILL SITE

WES has conducted site environmental audits at the Forks Mill site since 1999. Parametrix reviewed eight audit reports from May 2001 to June 2006. Summaries of the observation made during the audit site walks are provided below.

- The May 21, 2001 audit of the Forks Mill site lists the site address for the Beaver Mill site. The General Conditions section of the audit discusses the conditions of distinct Forks Mill site features like the boiler system and stormwater drainage canals that parallel the site on the east and west sides. The description of the site then appears to describe the Beaver Mill site when discussing the south mill collection pond and lagoon; these features are not present at the Forks Mill site. The remaining audit clearly discusses the Beaver Mill site.
- The May 24, 2002 audit noted that it was being conducted in response to an Ecology site visit that noted several violations. The violations noted during the Ecology inspection were not described. The audit states that the plant, shop, and yard area of the site were in good condition and there were no signs of chemical or petroleum stains. No other observations regarding chemical or petroleum storage were noted.
- The October 18, 2002 audit observed that a new boiler had been installed at the site. The boiler burns hog fuel and ash. It was noted that boiler condensate and blow down water was being contained in an open top tank with heat coils that flash off the water. It was noted that the tank had overflowed and hog fuel was being used as an adsorbent to prevent the process water from reaching the stormwater system. It was also noted that two drums containing water treatment chemicals were being stored in the boiler building and had no spill containment system. It was observed that a spill could end up in the condensate collection tank. Observations made during the previous audit indicated the tank could overflow and discharge to the stormwater collection ditch, which would release boiler water treatment chemicals to soil.
- The March 11, 2003 audit noted that the condensate overflow system was enhanced
 with additional piping. The audit recommended that the boiler water treatment
 chemical system be modified by piping the chemicals from the drum storage area to
 the boiler. This would avoid the need to move the drums as frequently, which would
 reduce the likelihood of potential drum spills during transfer from the containment
 area.
- The October 13, 2003 audit again recommended that the boiler water treatment chemicals be plumbed to the boiler to avoid having to move the drums to the treatment location. The audit notes the presence of an 11,000-gallon oil tank that was previously used for operating the boiler prior to the installation of the new boiler. However, the new boiler was noted to be much more efficient and the oil tank was not being used but still contained residual oil. It was observed that the tank was in good condition and leaks were not observed. An approximately 3,000-gallon diesel fuel AST and dispensing area were noted to be located in the northwest corner of the mill building. The survey noted that the tank was exposed to stormwater and the asphalt pavement was stained and degraded due to diesel fuel spills and drips. The audit recommended a permanent cover and spill containment structure be constructed around the tank.
- The September 9, 2004 audit stated that the boiler water treatment chemicals where now being piped and injected directly into the boiler system and no longer needed to be moved periodically from the containment area. Asphalt regrading and a roof

covering the diesel fuel tank were noted. A raised spill containment basin was also added. The basin was observed to be small and require frequent maintenance. A wood beam was noted to be around the AST and saw dust was placed inside the beam to absorb small spills. It was noted that drums in the mill building and maintenance shop did not have secondary containment. Secondary containment for the drums was recommended.

- The April 21, 2005 audit again recommended that drums in the mill building and the
 maintenance shop be set in secondary containment. The observations and
 recommendations in this audit were virtually identical to those made during the
 previous audit. No significant differences were noted.
- The July 10 2006 audit again repeated much of the information from the previous audit. No new information or observations were provided.

5. SITE EXAMINATION

Parametrix conducted a site examination of the Beaver Mill and Forks Mill sites on July 22, 2008. The site examination consisted of observing the areas immediately surrounding the subject properties, visiting representative areas of the subject properties, providing observations of the general environmental conditions on the subject properties, and visually assessing the subject properties and adjacent properties for evidence of hazardous materials and petroleum products. Interior portions of the subject properties buildings were not examined. Parametrix was accompanied on the site walk with Rick Forgaard (Interfor Pacific), Warren Blakeslee (Portac, Inc.), and Gary Takahashi (Portac, Inc.). Photographs of the subject properties taken during the site walk are included in Appendix D.

5.1 SUBJECT PROPERTIES

5.1.1.1 Beaver Mill Site

Only the exterior portions of the Beaver Mill site were examined. The Beaver Mill site is an operating saw mill that produces rough cut lumber which is then sent to the Forks Mill site to be kiln dried and planed. The mill also creates bark dust and chips which are used as hog fuel in the Forks Mill site boiler. Site buildings include a maintenance shop, lubricant shed, debarker and chipper, saw mill, and offices. Areas of concern are discussed below.

Maintenance Shop

Only the exterior of the maintenance building was examined. During the site walk, several oil stains and spills were observed in the vicinity of the maintenance shop. It appeared that equipment repairs were performed on the asphalt surrounding the shop (Photographs 1 and 2). Near the shop, several empty drums of lubricant were located at the northwest corner of the shop. One drum was not covered and rain water had filled the container (Photographs 3 and 4).

Exterior of the Sawmill Building

Only the exterior of the mill building was examined. A small oil stain was observed on soil located near the southwest corner of the mill building near the lagoon (Photograph 5). It was stated by Warren Blakeslee that earlier in the year during mill downtime, the mill was washed down with a fire hose and the water washed off of equipment had drained out of the corner of the mill and into the lagoon and slough area located west of the site. A small stormwater infiltration basin was observed north of the mill building where stormwater from the paved area appears to empty into the soil basin. The basin was constructed from concrete blocks and a steel grate over the area where water drains onto the soil (Photograph 6). Oil stains were observed on the paved area prior to entering the basin in trapped sediment. Several absorbent pads and booms containing oil stains were observed in front of the grate apparently in an attempt to collect oil prior to the basin (Photograph 7). However, oil staining was also observed on soil in the basin (Photograph 8). Several pieces of old equipment were observed north of the mill. One of these parts was observed to be leaking hydraulic oil to the ground surface (Photograph 9). An approximately 500-gallon AST was observed along the east side of the mill and appeared to be piped into the mill building (Photograph 10). The tank was not labeled and the contents of the tank were not determined.

Aboveground Storage Tank

An approximately 12,000-gallon diesel fuel tank is located east of the mill building near the hog fuel bag house hoppers (Photograph 11). The tank appeared to be in good condition and had overhead cover at the dispensing area. A concrete berm and sump was also observed. Several oil stained rags and saw dust was noted near in containment berm (Photograph 12). Major oil staining in the vicinity of the AST was not observed.

Lubricant Storage Shed

A small shed located west of the mill offices is used to store the site's lubricants. The shed contained one approximately 500-gallon AST, one approximately 275-gallon AST, several 55-gallon drums, and several 5-gallon buckets containing various types of hydraulic and motor oil. The floor of the shed was heavily stained with oil and oil soaked absorbent pads littered the floor and tops of drums (Photographs 13 and 14). Outside of the shed empty and full drums were placed on pallets and on the ground (Photograph 14). Minor staining could be observed just outside the shed doors.

5.1.1.2 Forks Mill Site

Only the exterior portions of the Forks Mill site were examined. The Forks Mill site is an operating planning mill that finishes rough cut lumber from the Beaver Mill to be kiln dried and planned. Site buildings include a maintenance shop, planner mill with offices, kilns, boiler house, cooling shed, and sawdust shed. Areas of concern are discussed below.

Mill Building

A 3,000-gallon diesel fuel tank is located at the northwest corner of the mill building (Photograph 15). The tank was observed to have overhead cover over the dispenser area. A spill containment pad was located under the refueling area. The pad is a raised concrete structure with a trough in the middle and grate. Minor staining was observed on the basin and surrounding asphalt (Photograph 16). The pad appeared to be full of sawdust material and may not be capable of withholding significant spills (Photograph 17).

A pipe was observed extending out of the east site of the mill building. Water appeared to have been blown out of the pipe on to the asphalt. The water contained an oil sheen and was observed to be draining to the eastern stormwater ditch (Photographs 18 and 19). Oil stained concrete was observed near a motor located on the south end of the mill at what appeared to be a conveyor for finished lumber products out of the mill building (Photograph 20).

Maintenance Shop

The maintenance shop is located along the western edge of the Forks Mill site. The shop contained three approximately 275-gallon ASTs of waste oil, hydraulic oil, and motor oil (Photograph 21). The shop also contained several smaller quantities of lubricants and solvents and a parts washing station. Spent solvents are reportedly picked up by a local company and disposed or reused. Several stains were observed in the shop area. At the northwest corner of the shop, heavy staining was observed on the asphalt pavement and in the stormwater drainage ditch located along the western boundary of the property (Photograph 22). Stained concrete was observed east of the shop beneath a large forklift (Photograph 23). A catch basin was observed east of the shop (Photograph 24). The basin appeared to drain a low area on the east side of the shop and empties to the western stormwater drainage ditch. Oil stained soil was present in the ditch (Photograph 25).

Phase I Environmental Site Assessment – Portac, Inc. Beaver Mill and Forks Mill, Clallam County, Washington Interfor Pacific

Yard Area

A small oil stain was observed beneath a front loader located northeast of the sawdust shed (Photographs 26 and 27).

5.2 ADJACENT PROPERTIES

Adjacent properties were examined from public areas for the presence of environmental conditions which have the potential to impact the subject property.

5.2.1.1 Beaver Mill Site

The vicinity of the subject property is developed with residential properties to the east and west of the Beaver Mill site. Highway 101 and commercial forest are located south of the site and Lake Pleasant borders the site to the north. No recognized environmental conditions which could impact the subject property were observed on adjacent properties.

5.2.1.2 Forks Mill Site

The vicinity of the Forks Mill site is relatively undeveloped. A Pacific Pride card lock was observed west of the Forks Mill site. The card lock operation contained four ASTs and a dispenser island. An Exxon Mobil distributor was located northwest of the site. Several ASTs and 55-gallon drums were observed around the building. No recognized environmental conditions which could impact the subject property were observed on adjacent properties.

6. INTERVIEWS

Interviews were conducted with key site personnel to identify any information indicating recognized environmental conditions in connection with the subject properties.

6.1 WARREN BLAKESLEE INTERVIEW

Parametrix interviewed Mr. Warren Blakeslee, manager of the Beaver Mill site, on July 22, 2008. Mr. Blakeslee has been working at the Beaver Mill since Portac, Inc. bought the site in 1989. He stated that the former owners of the mill site had operated an oil storage shed at the northeast corner of the mill building. He indicated that the oil storage was placed directly above bare ground and appeared to have leaks. Mr. Blakeslee recalled an incident that occurred where a backhoe excavating a berm located west of the site had ruptured a hydraulic line and that oil had sprayed the immediate vicinity of the backhoe. Mr. Blakeslee was not aware of any other spills or incidents at the site. He stated that before Portac purchase the mill, it was a veneer and chip mill operated by McDougal Brothers Forest Products. Prior to the McDougal Brothers, Dean Hern owned the site for 10 years. He indicated he had no knowledge that lumber treatment occurred at the site.

6.2 JIM WOODWARD INTERVIEW

Parametrix interviewed Mr. Jim Woodward, manager of the Forks Mill site, on July 22, 2008. Mr. Woodward has been working at the Forks Mill since 2005. The mill has been at the site since approximately 1995. Mr. Woodward stated he was not aware of any spills occurring at the site. He indicated that the 11,000-gallon oil tank used to heat the boiler had not been in use since 2002.

conclusions

Parametrix has conducted the Phase I ESA in conformance with the scope and limitations of ASTM Standard Practice E 1527-05 of the Beaver Mill and Forks Mill sites. Any exceptions to, or deletions from, the Standard Practice are described in Section 1.2 of this report. Based on the findings of this investigation, Parametrix reached the following conclusions:

- The subject properties are located in Clallam County Washington and include the Beaver Mill and Forks Mill sites. The Beaver Mill is a 44-acre site located at mile post 201 on Highway 101 near Beaver Washington. The Forks Mill site is a 21.5-acre site located a 143 Sitcum Sol Duc Road in Forks Washington.
- 2. The Beaver Mill site is an operating saw mill that produces lumber which is trucked to the Forks Mill. The Forks Mill site is an operating planner mill and kiln which takes sawn lumber from the Beaver Mills site. The lumber is then trimmed to length, planed, graded, and packaged for shipment to customers.
- Based on historic information, the Beaver Mill site began operations at the site between 1947 and 1957. The site had been a veneer mil and a chip mill prior to the saw mill operation. The Forks Mill site has been operating at that site since 1995 when the planing mill and kilns were constructed.
- 4. A review of regulatory information indicates that the Beaver Mill and Forks Mill sites are listed in the regulatory databases. The Beaver Mill site is listed as an Orphan site in the CSCSL-NFA database. The site reportedly received a No Further Action Determination from the State after initial assessment of the site. The Forks Mill site is listed in the SPILLS database. The site reportedly had a spill of 350-gallons of diesel fuel which was released to a paved roadway in September 2001. The spill at the Forks Mill site represents a recognized environmental condition. The spill was contained on the pavement and no impacts occurred.
- Several adjacent or nearby sites were identified in the regulatory record databases.
 However, based on the level of cleanup at these sites or the distance of these sites to
 the subject property, these sites do not appear to represent recognized environmental
 conditions to the subject property.
- Environmental audits by WES were reviewed to gain an understanding of past potential environmental concerns. The audits indicate that minor spills, leaks, and site conditions representing environmental concern were observed. Based on these observations, petroleum product impacts to subsurface soil at the Beaver and Forks mills may have possibly occurred. The audits noted that rain water from the collection sump at the Beaver Mill site was passed though an oil/water separator and discharged to the pavement which eventually leads to the stormwater collection system. This process could be a transport mechanism for petroleum impacted water to reach the stormwater system and potentially subsurface soil at the site from repeated releases. Other observations indicated that the spill containment pad constructed at the 3,000-gallon diesel fuel AST at the Forks Mill site was undersized and required frequent maintenance to clear debris from the spill collection area. However, this area is paved and presents a small likelihood of petroleum product impacts to the subsurface. It was also noted that process water at the Forks Mill site was observed to be overflowing from the condensate tanks and could eventually reach the unlined stormwater ditch. It was also noted the 11,000-gallon oil AST near the boiler at the Forks Mill site does not contain overhead cover or spill containment. In addition, boiler water treatment chemical drums were observed at the Forks Mill

- site without secondary containment. The audits also indicate Portac made efforts to correct most of the recognized environmental conditions noted in the reports.
- 7. During the site walk, both the Beaver Mill and Forks Mill showed signs that oil spills or leaks had come in contact with soil and pavement. Several oil stains on pavement were observed surrounding the maintenance shop of the Beaver Mill site. Oil stained soil was observed at the southwest corner of the mill building, at the north side of the mill building at a stormwater collection basin and beneath old equipment north of the mill building. Significant oil stained concrete was observed in the lubricant shed and minor oil stains on asphalt pavement just outside the shed.
- Oil stained pavement was observed at the 3,000-gallon diesel fuel AST and north of
 the maintenance shop at the Forks Mill site. Oil stained soil was observed northwest
 of the maintenance shop and beneath a front loader northeast of the kiln cooling shed.
- 9. The interview with the key site manager at the Beaver Mille site indicated that recognized environmental conditions may be present from past operations. Warren Blakeslee stated that the previous mill owner had stored oil drums above soil near the northeast corner of the mill and spills and leaks had occurred. The oil leaks to the soil in this area represent a recognized environmental condition. The interview with the key site manager at the Forks Mill site had no knowledge of site conditions not observed during the site visit that would represent recognized environmental conditions.
- Data gaps exist due to the incomplete examination of all site features, specifically interior portions of the mill buildings.

8. RECOMMENDATIONS

Based upon the conclusions of this investigation of the subject property, Parametrix offers the following recommendation.

- Areas of identified oil stains and potential environmental impact should be inspected and cleaned up, as appropriate. All stained soil should be excavated and disposed in accordance with local and state regulations.
- General housekeeping practices, including equipment maintenance, equipment storage, facility washdown, and chemical or petroleum use, storage, and transfer, should be reviewed and modified to prevent potential environmental impacts.
- All oil storage areas should be reviewed for compliance with Spill Prevention, Control and Countermeasure (SPCC) regulations. Deficiencies with petroleum storage, including overhead cover or secondary containment, should be corrected. An SPCC Plan should be prepared or updated, as needed.
- 4. Operations at the sites, specifically stormwater runoff and process water discharge, should be reviewed and modified to prevent possible impacts to the subsurface. All areas of oil residue in contact with stormwater discharge (i.e., stormwater infiltration basin at the Beaver Mill site and exterior pipe at the Forks Mill building) should be modified such that oil residue does not enter the stormwater system or subsurface.

9. REFERENCES

EDR (Environmental Data Resources, Inc.). 2008a. Portac – Forks Mill Radius Report, 2272117.10s. July 21, 2008.

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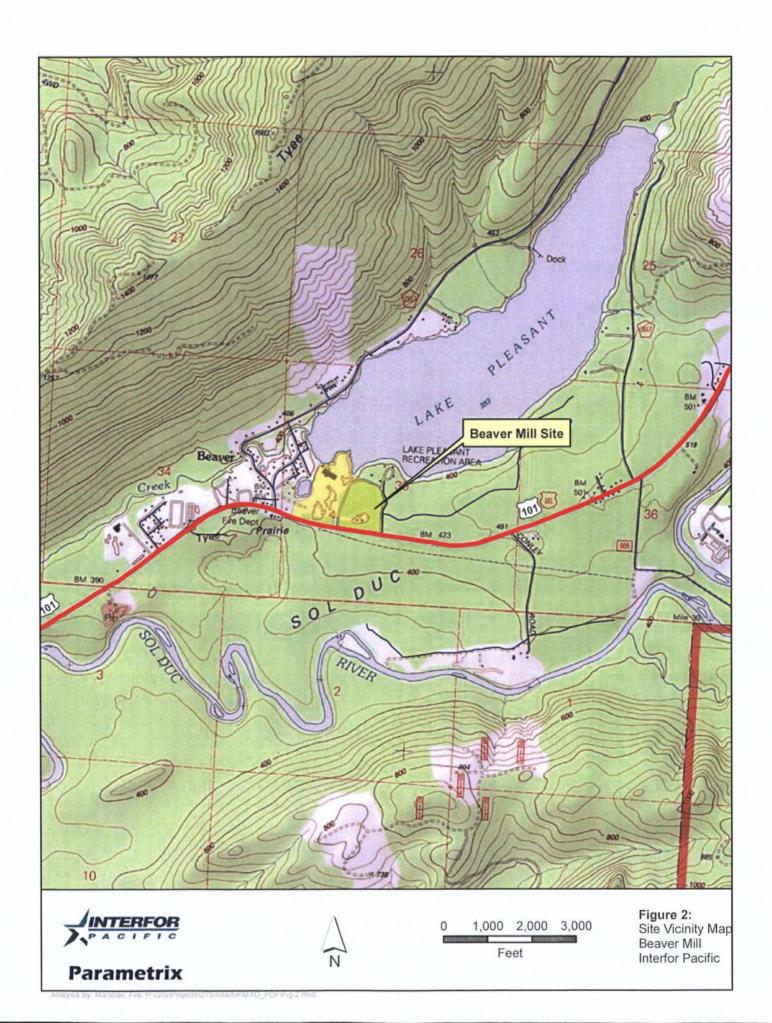
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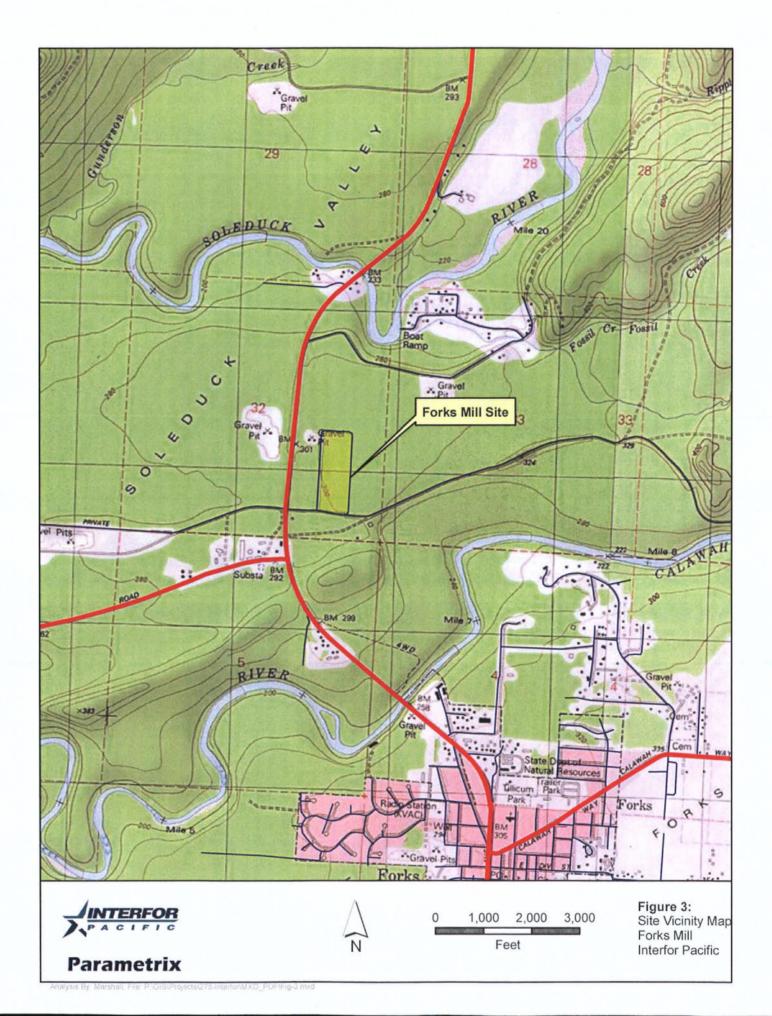
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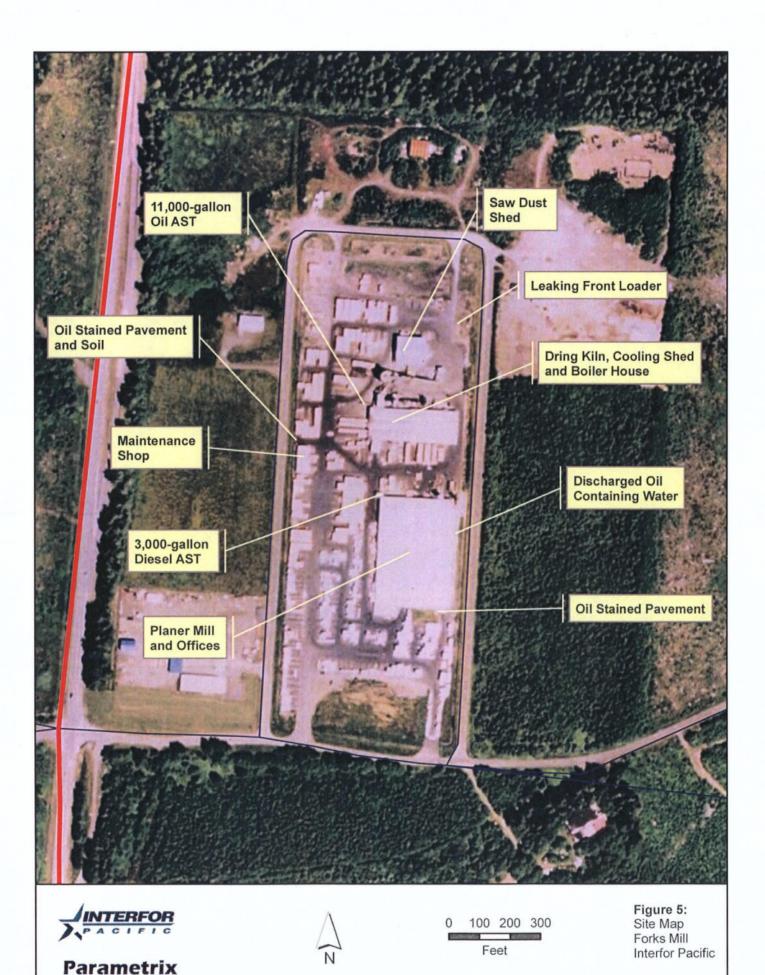
FIGURES











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APPENDIX A

EDR Report

Portac - Beaver Mill Highway 101 - MP 201 Beaver, WA 98305

Inquiry Number: 2272117.6s July 23, 2008

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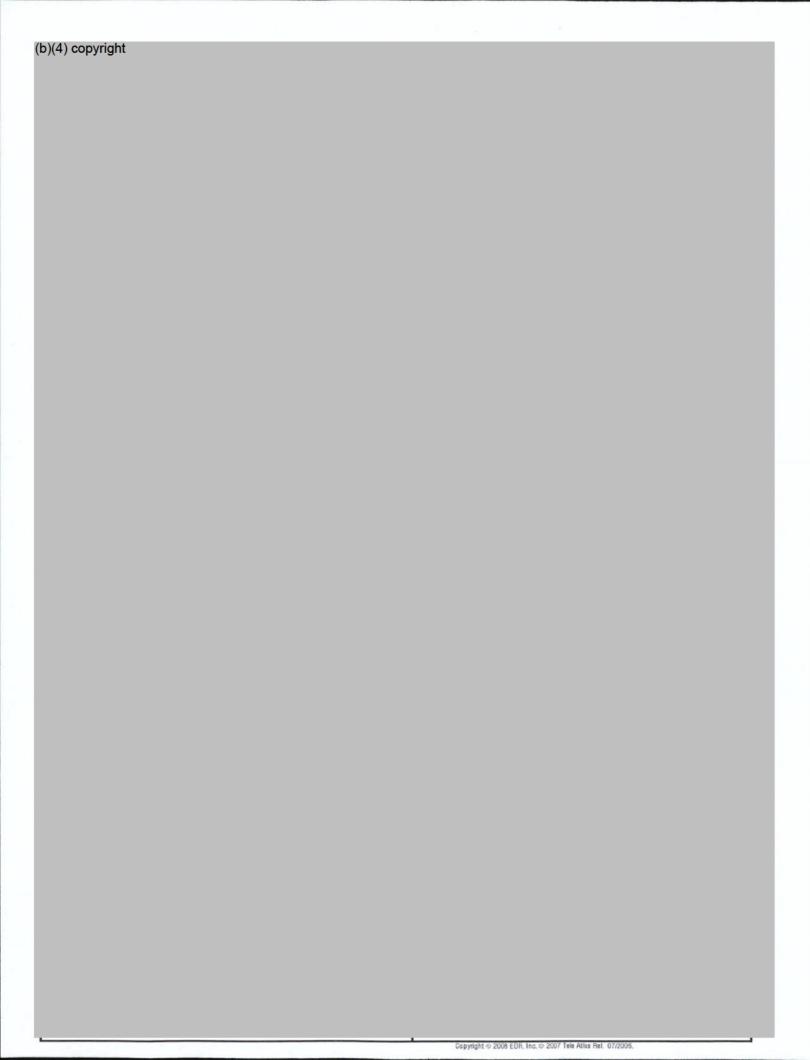
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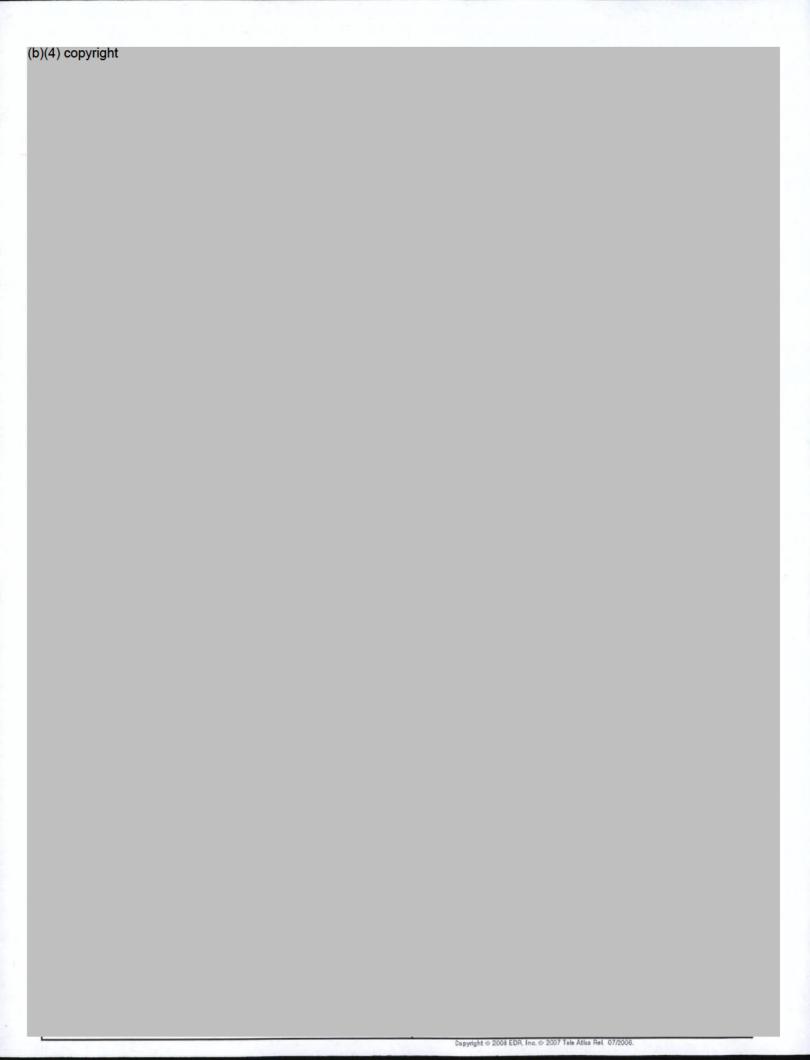
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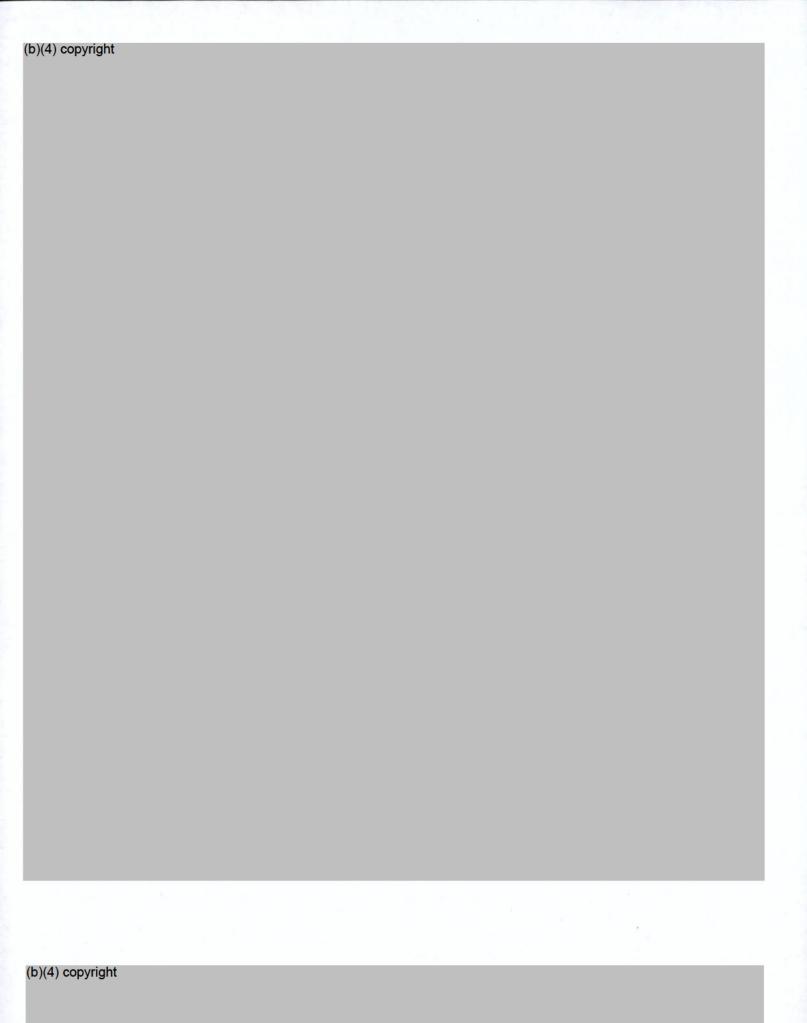
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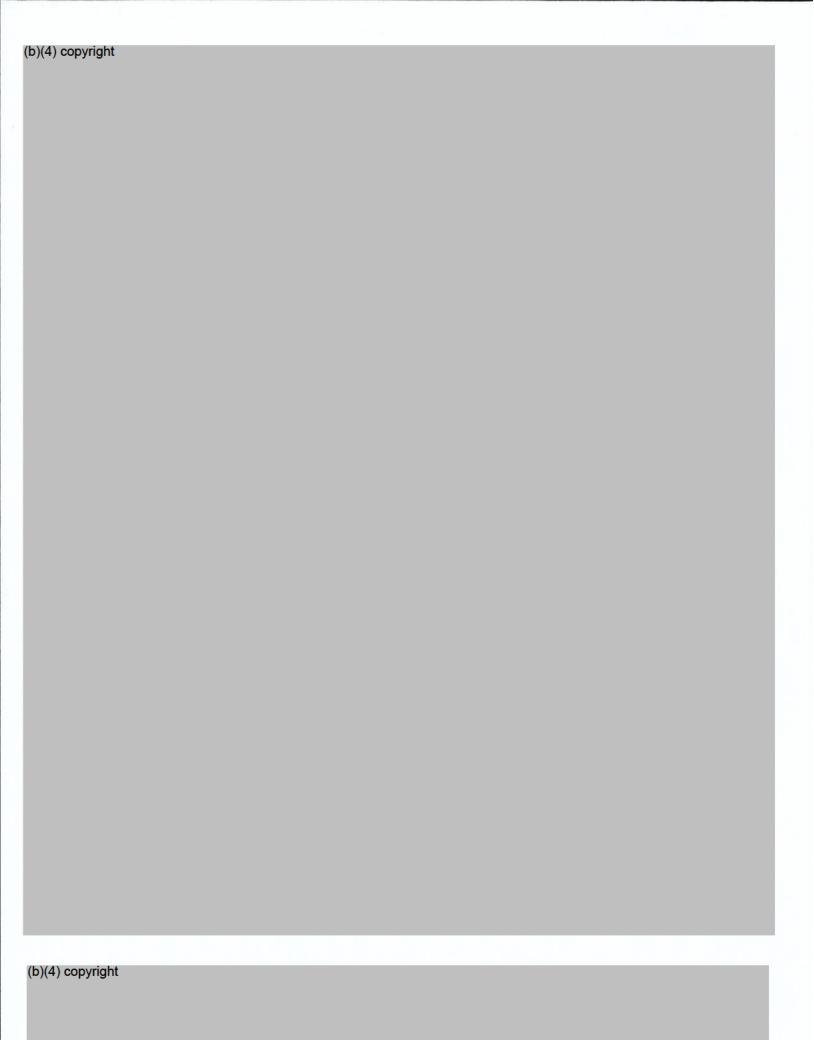


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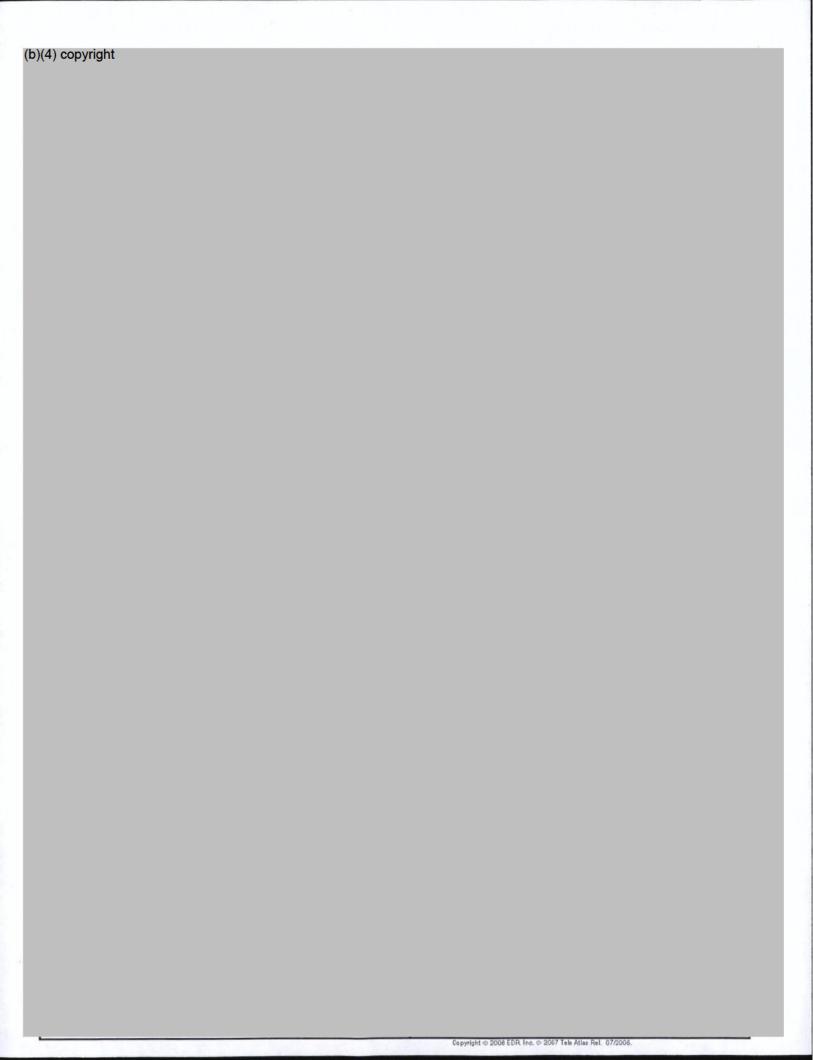
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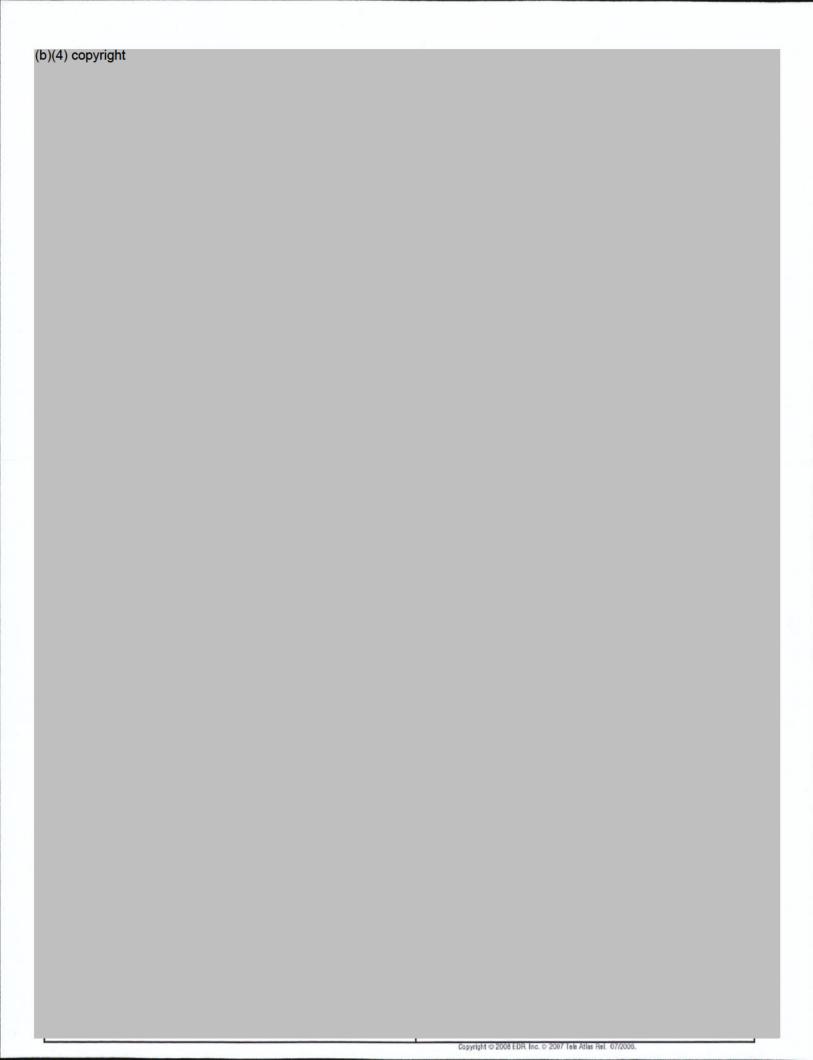
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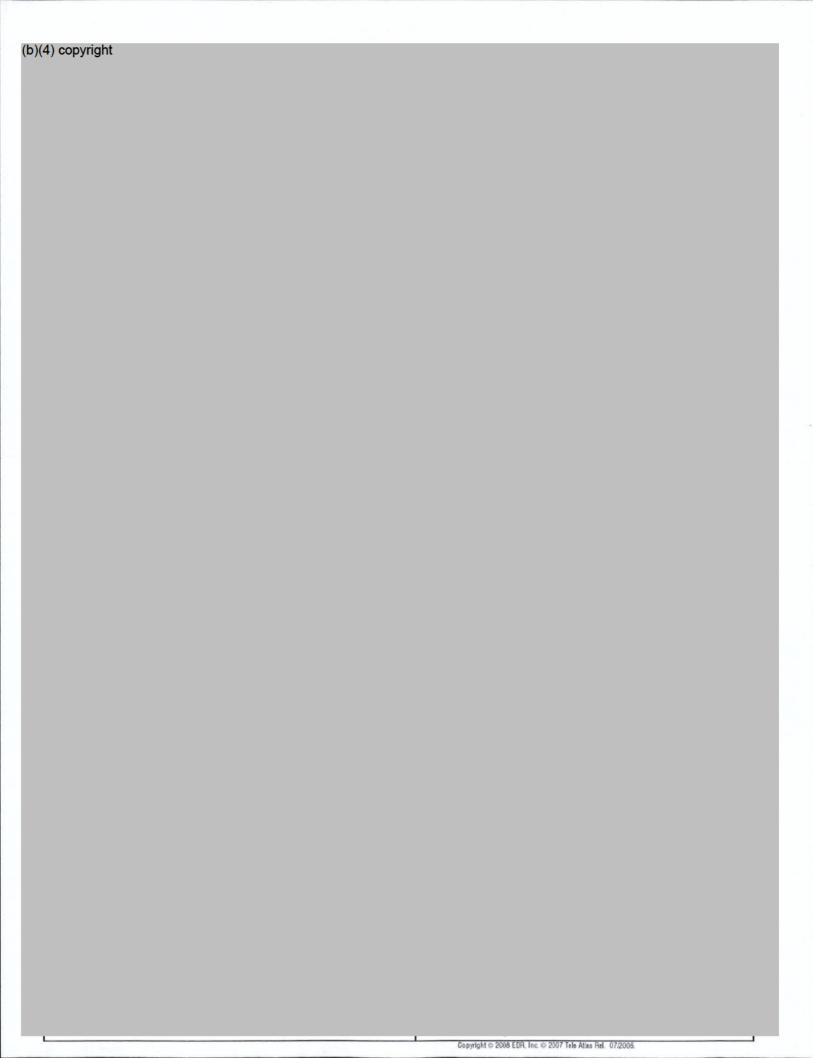
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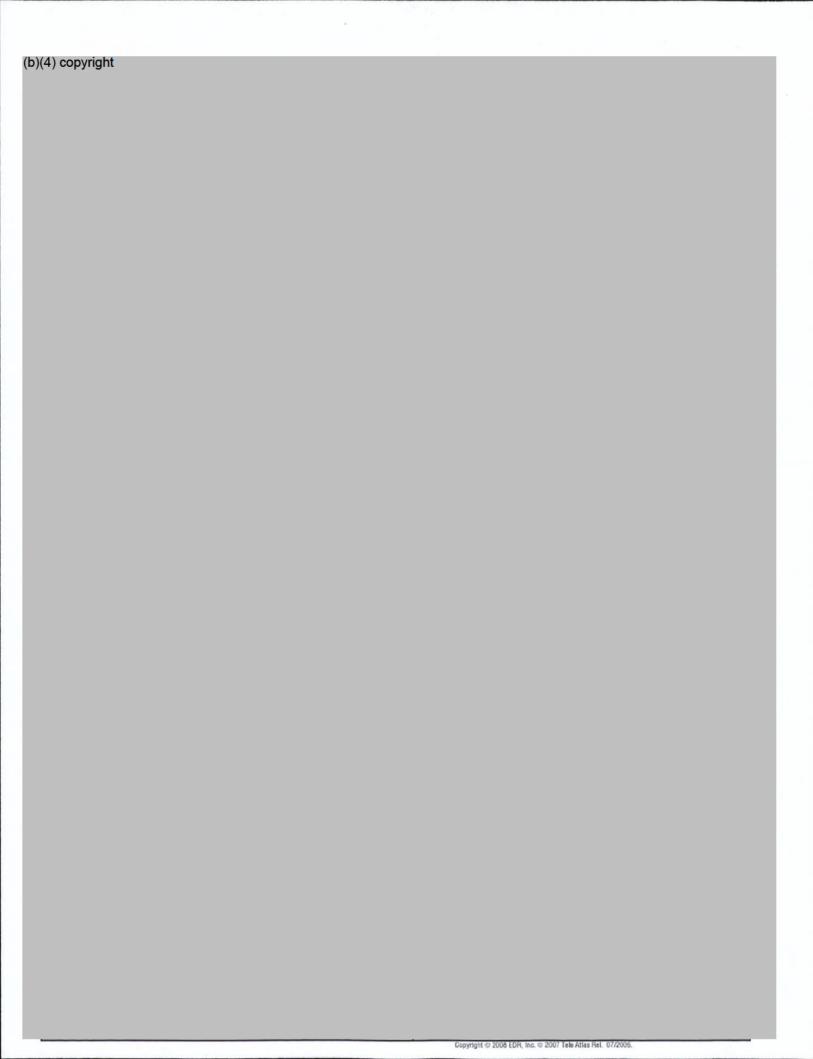
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APPENDIX B

Sanborn Maps

Portac - Beaver Mill Highway 101 - MP 201 Beaver, WA 98305

Inquiry Number: 2272117.7

July 18, 2008

Certified Sanborn® Map Report



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Portac - Forks Mill 143 Sitkum Sol Duc Road Forks, WA 98331

Inquiry Number: 2272117.11

July 18, 2008

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APPENDIX C

Historic Aerial Photos

Beaver Mill

200673 HWY 101 Beaver, WA 98305

Inquiry Number: 2281665.1

July 31, 2008

The EDR Historical Topographic Map Report



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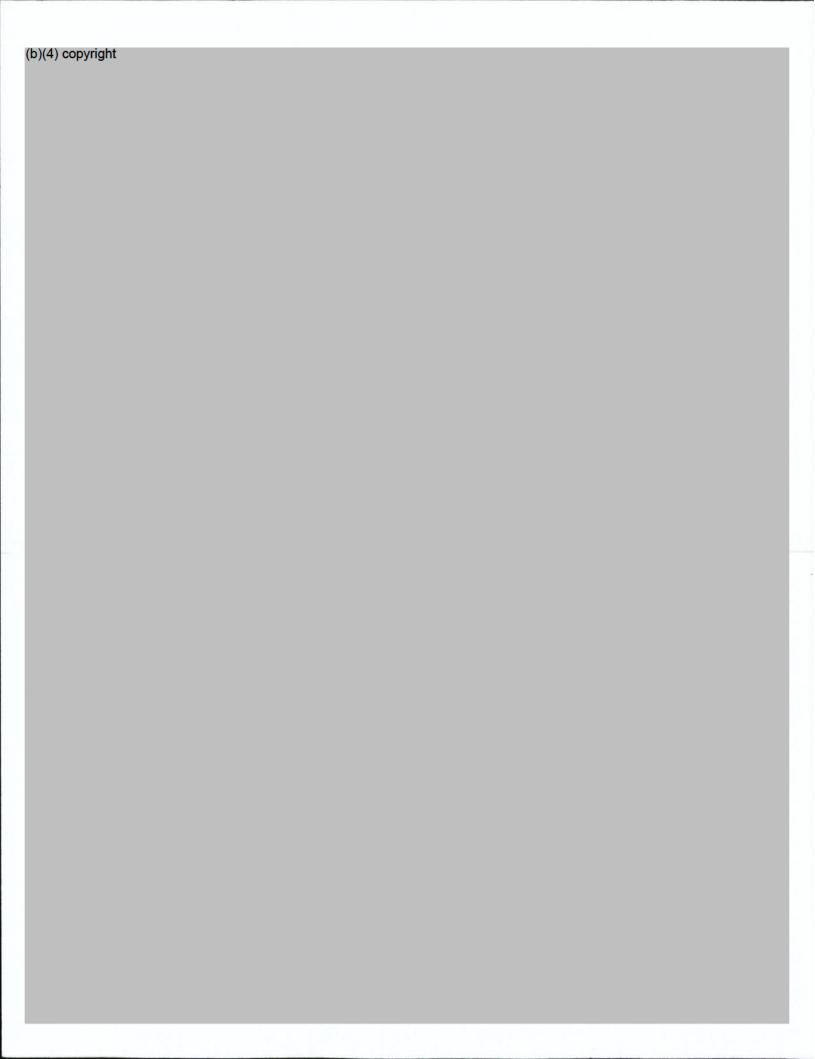
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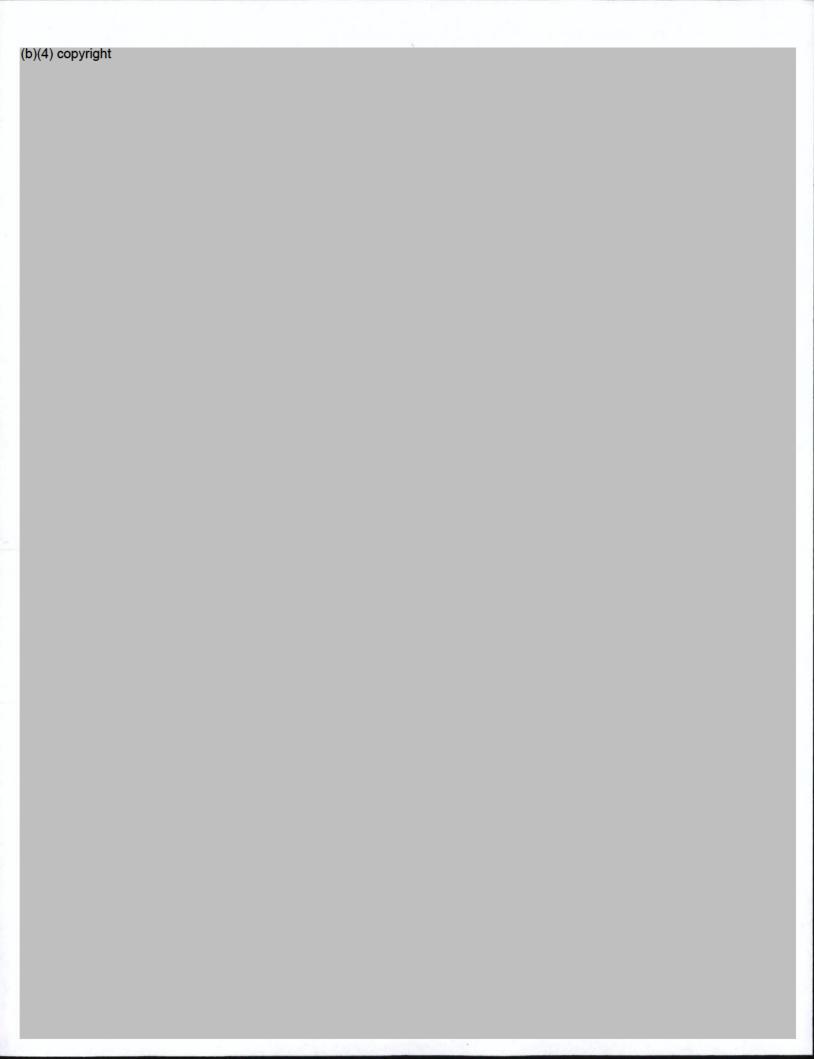
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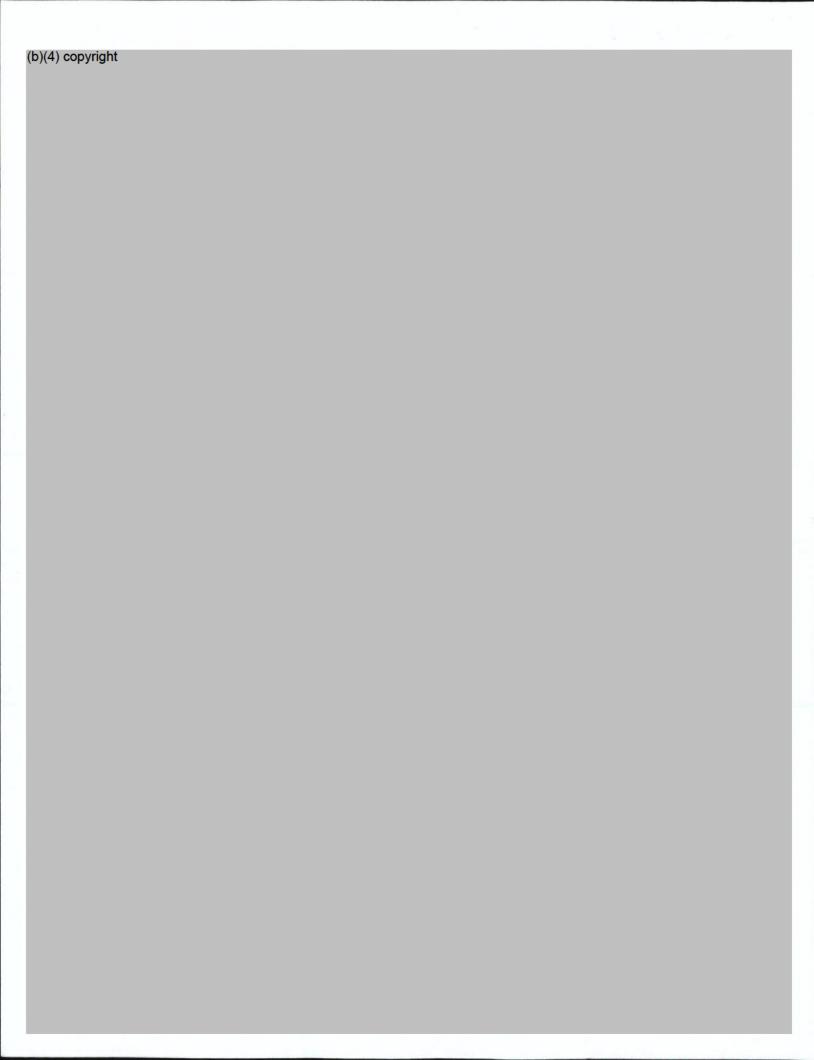
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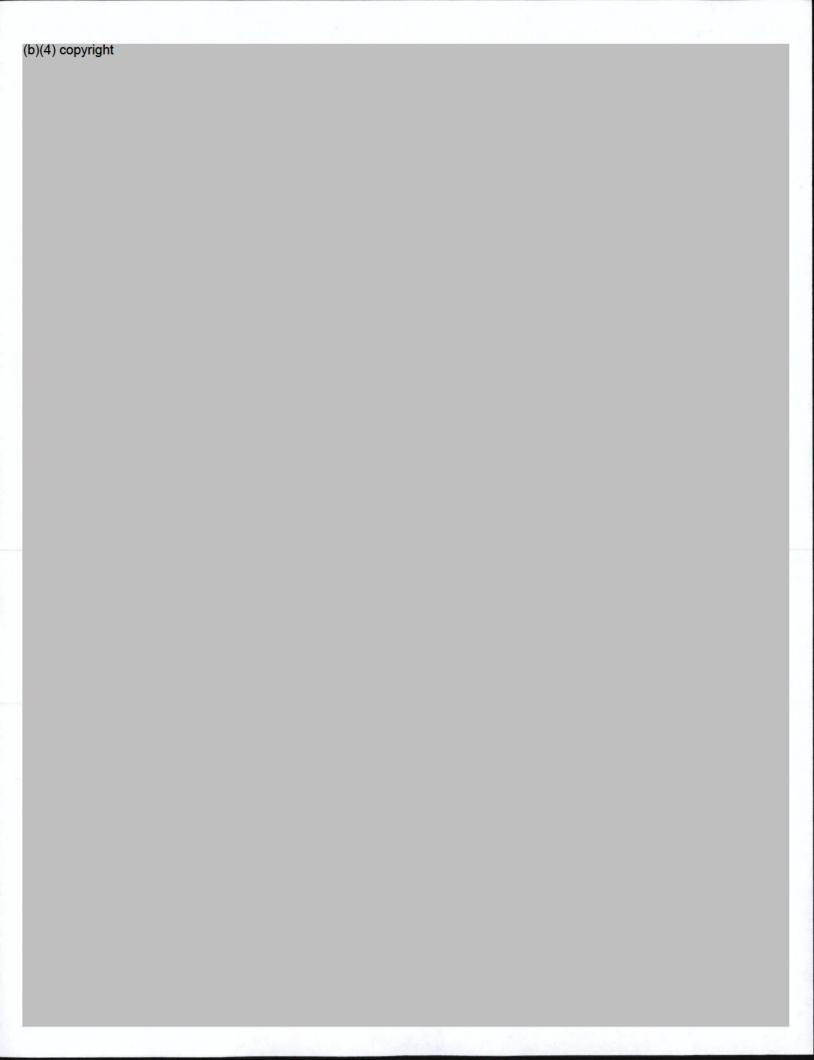
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Forks Mill 143 Sitcum Sol Duc Way Forks, WA 98331

Inquiry Number: 2281665.2

July 31, 2008

The EDR Historical Topographic Map Report



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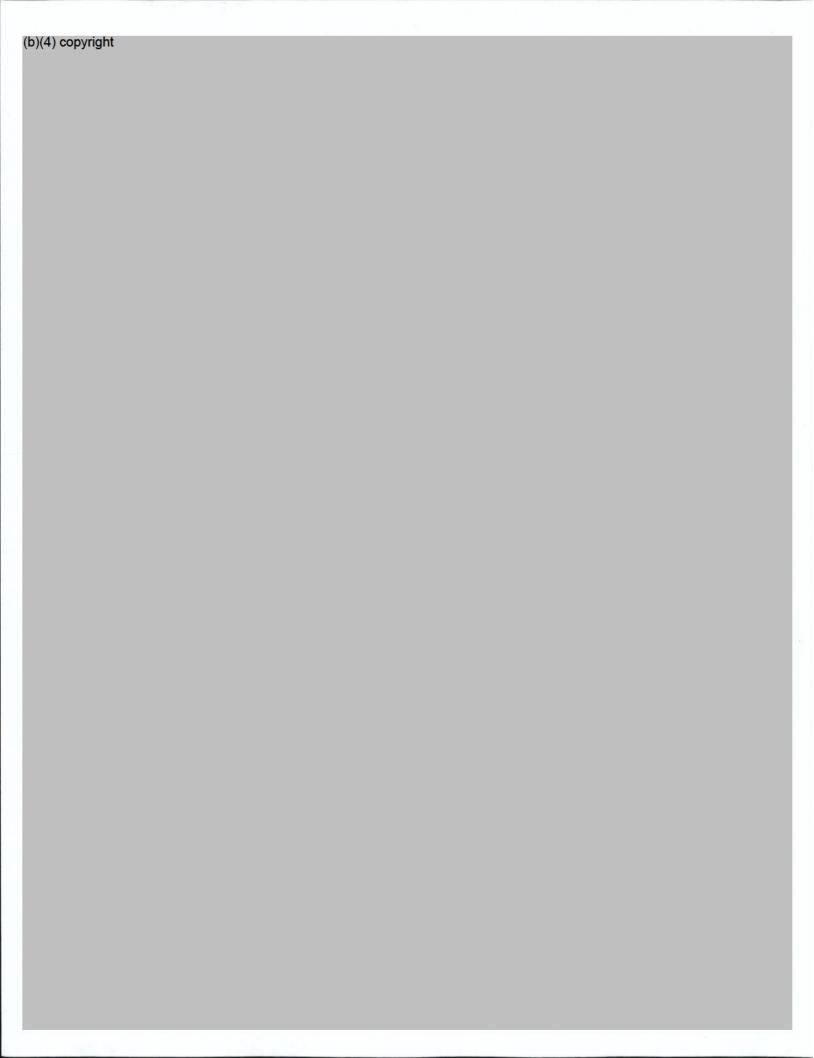
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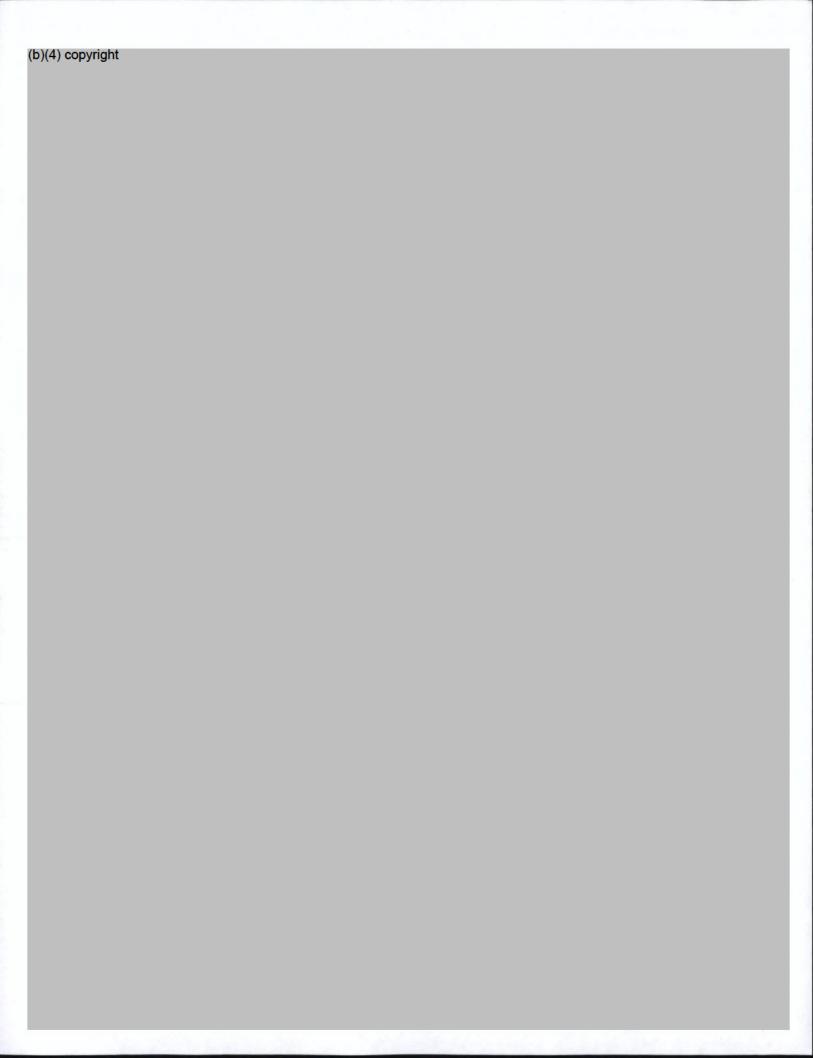
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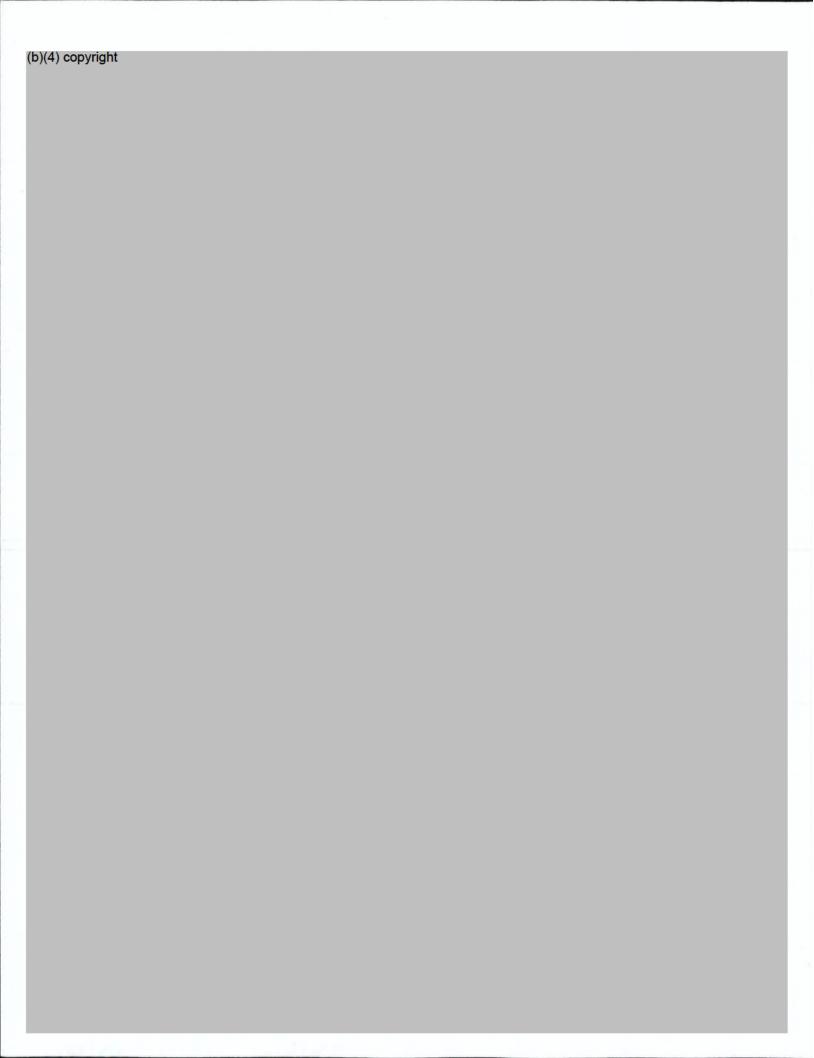
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APPENDIX D

Site Photos

Portac - Beaver Mill Highway 101 - MP 201 Beaver, WA 98305

Inquiry Number: 2272117.8

July 23, 2008

The EDR Aerial Photo Decade Package



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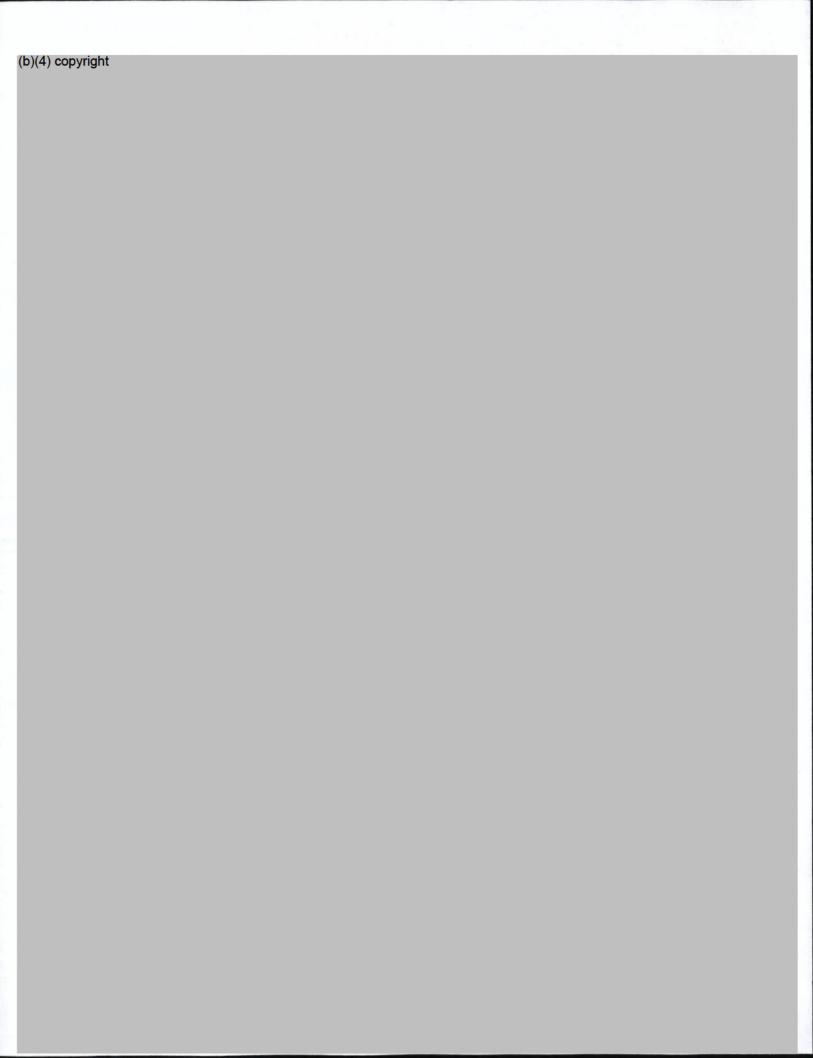
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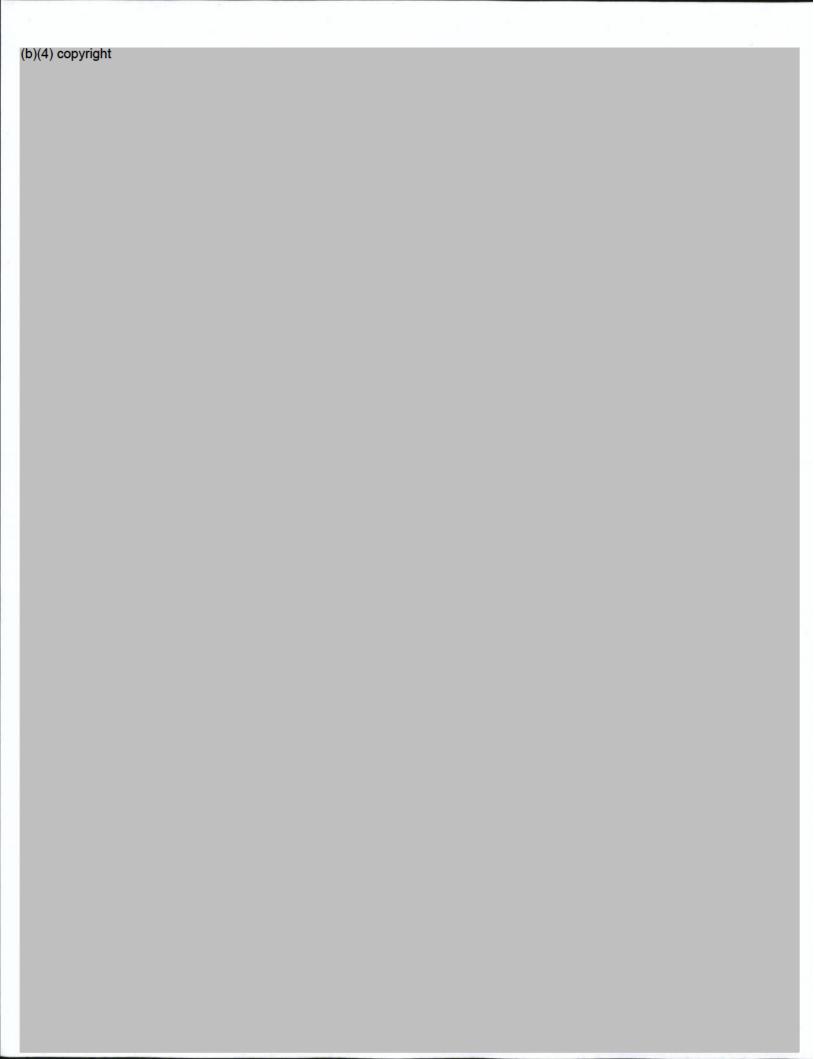
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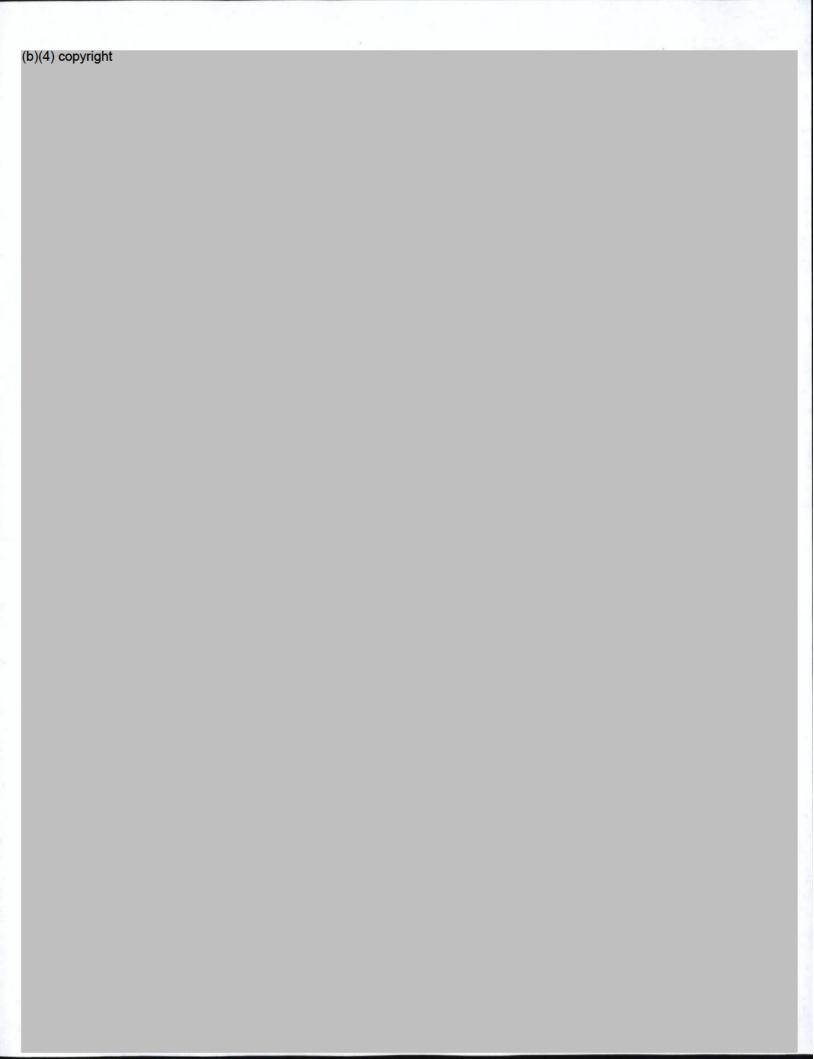
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Portac - Forks Mill 143 Sitkum Sol Duc Road Forks, WA 98331

Inquiry Number: 2272117.12

July 23, 2008

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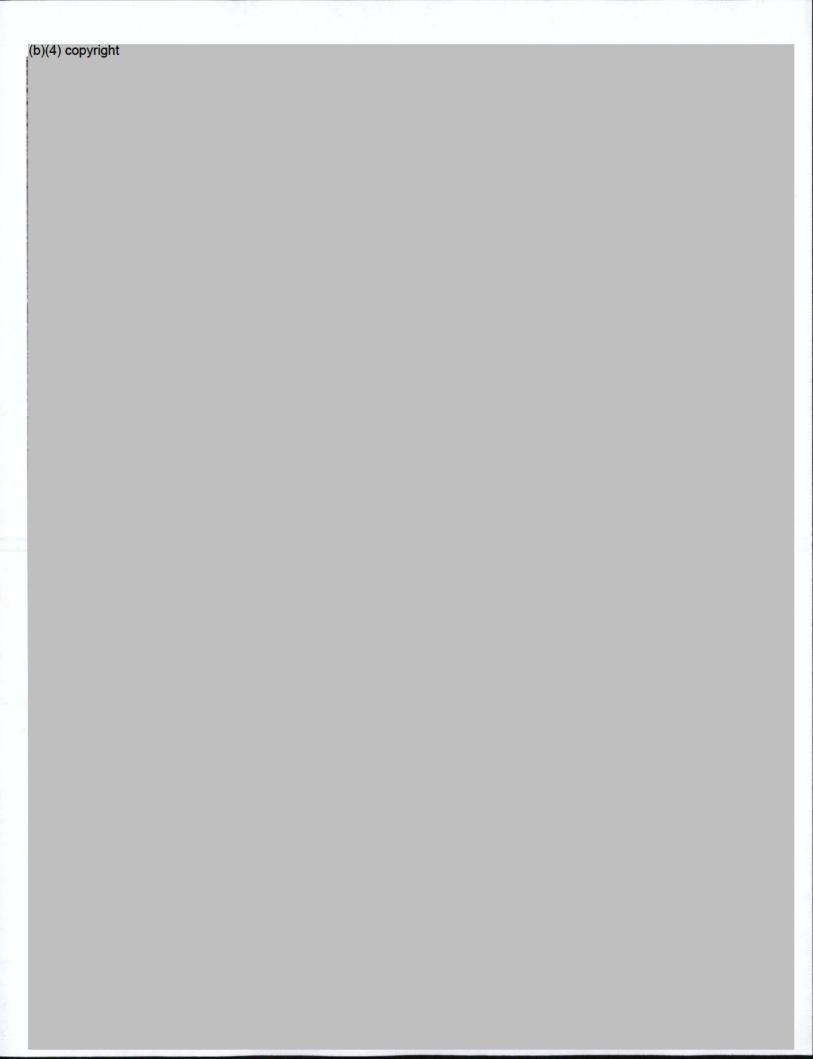
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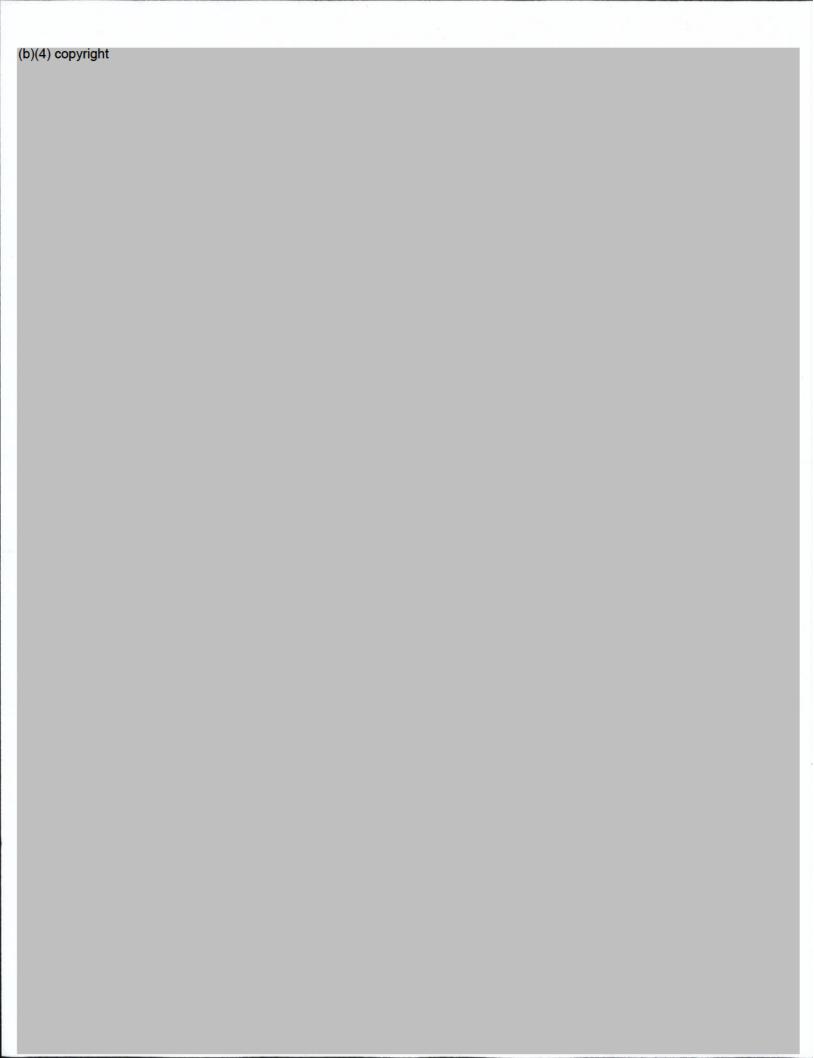
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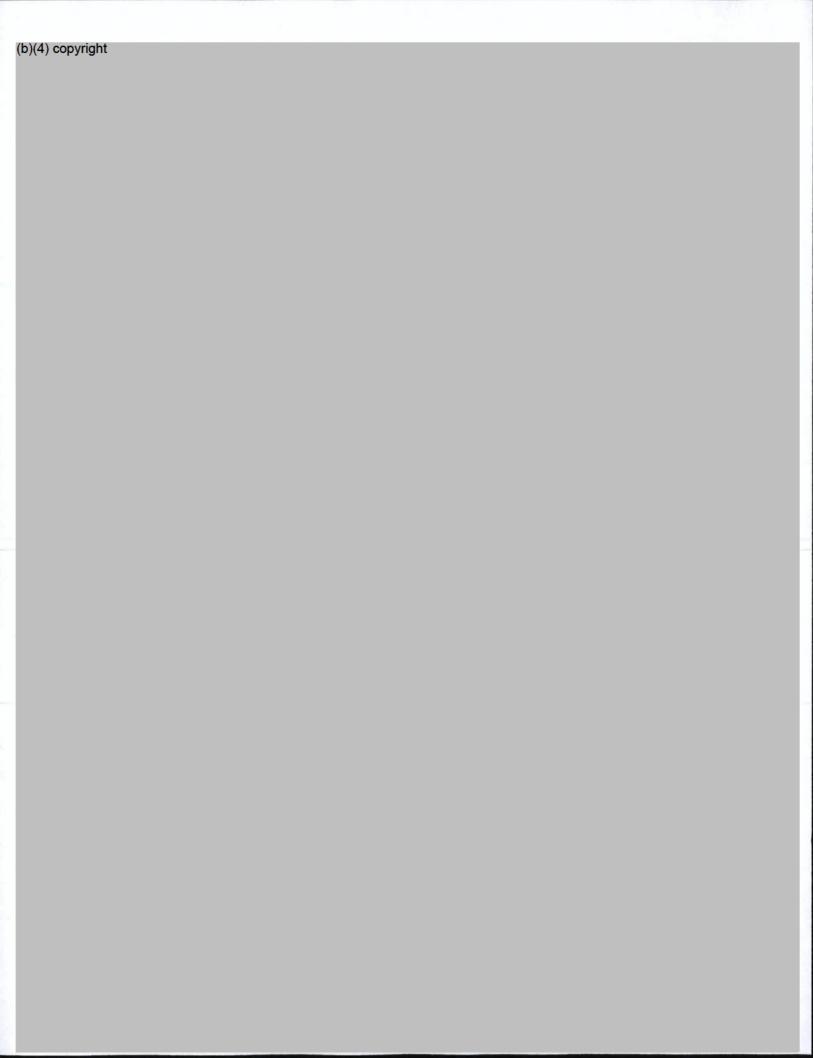
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APPENDIX E

Geophysical Survey Report



Photograph 1: Oil stained pavement outside Beaver Mill shop



Photograph 2: Oil stained pavement outside Beaver Mill shop

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Photograph 3: Empty oil drums outside Beaver Mill shop



Photograph 4: Empty oil uncovered drum outside Beaver Mill shop

Appendix E - 2 275-5020-001 (05/01)



Photograph 5: Oil stained soil SW corner of mill



Photograph 6: Stormwater collection basin north of Beaver Mill building



Photograph 7: Oil stained soil and absorbent pads collection basin Beaver Mill



Photograph 8: Oil stained soil at collection basin Beaver Mill

Appendix E - 4 275-5020-001 (05/01)



Photograph 9: Leaking hydraulic oil from old equipment



Photograph 10: AST

275-5020-001 (05/01)



Photograph 11: 12,000-gallon diesel fuel AST



Photograph 12: AST spill containment

275-5020-001 (05/01)



Photograph 13: Lubricant storage shed Beaver Mill



Photograph 14: Lubricant storage shed Beaver Mill

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Photograph 15: 3,000-gallon AST Forks Mill



Photograph 16: Spill containment pad Forks Mill

Appendix E - 8 275-5020-001 (05/01)



Photograph 17: Spill containment pad Forks Mill



Photograph 18: Discharge water from east side of plan mill building

275-5020-001 (05/01)

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Photograph 19: Oil sheen in discharge water



Photograph 20: oil stained concrete south of Forks Mill building

Appendix E - 10 275-5020-001 (05/01)



Photograph 21: ASTs in Forks Mill shop



Photograph 22: Oil Stained pavement outside Forks Mill shop



Photograph 23: Oil stained pavement east of Forks Mill shop



Photograph 24: Catch basin east of Forks Mill shop



Photograph 25: Oil stained soil northwest corner of Forks Mill shop



Photograph 26: Front loader dripping oil to soil

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Appendix E - 14 275-5020-001 (05/01)